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- 1 A. Correct.
- 2 Q. And the notary would have been to use for the
- 3 affidavit?
- 4 A. Yes.
- 5 Q. But you never got the affidavit?
- 6 A. No.
- 7 Q. Going back to between March and October of '04,
- 8 any other conversations you can recall with
- 9 Ms. Wolford that you haven't already told me
- 10 about?
- 11 A. Susan would mention she wanted to know about
- 12 Kathy Jenkins, if she was living in the house
- 13 with John. And I told her yes. I'm not sure
- 14 when Kathy moved in. I believe it was November
- 15 of 2003. I believe it was November of 2003, but
- 16 I'm not real sure. So she wanted to know about
- 17 that. And she -- she basically talked about how
- 18 bad he was treating her, how he wouldn't pay
- 19 child support and how they didn't have insurance
- 20 and he wouldn't provide insurance, or something
- 21 had happened to her car while she was in
- 22 Virginia, and he wouldn't help with that. And it
- 23 was a lot of complaints. She complained a lot
- 24 about his behavior towards her and -- and the
- 25 daughter.

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- 1 A. Uh-huh.
- 2 Q. And the other one was when you met her up in
- 3 Richmond?
- 4 A. Colonial Heights.
- 5 Q. Colonial Heights?
- 6 A. Uh-huh.
- 7 Q. Are there any other in-person meetings that
- 8 you've had with her other than those two?
- 9 A. Yes. I recall one other meeting, and I do not
- 10 remember -- oh. There was two. There was two
- 11 more. She came down -- she had a friend by the
- 12 name of Dawn, I believe, that lived in Henderson.
- 13 Q. Dawn, D-A-W-N?
- 14 A. Yes. I don't know her last name. And she would
- 15 come down to visit her, and she came down to see
- 16 her in -- I really don't -- it was in 2004, but I
- 17 don't know exactly when. And I told her, I said,
- 18 "When you come down you give me a call, and we'll
- 19 go out and have dinner." So we did. She came
- 20 down to visit Dawn, and she called me. And we
- 21 went out to dinner.
- 22 Q. Where did you go to dinner?
- 23 A. We went to Raleigh to Sweet Tomatoes. And then
- 24 we went shopping afterwards, Lifeway Christian
- 25 Bookstore right there next to Sweet Tomatoes.

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- 1 Q. During any of these conversations, did you share
- 2 anything with her regarding what was going on in
- 3 the department or your concerns about the drug
- 4 fund monies?
- 5 A. Yes. Yes, I did. That's why -- that's why I
- 6 asked her for the affidavit, if she would be
- 7 willing to do an affidavit. That's when I asked
- 8 her -- I asked her that back in March of '04,
- 9 "Did he take money out of other -- funds out of
- 10 other agencies?"
- 11 And she said, "Oh, yeah." She said he had a
- 12 history of that. She said every agency he had
- 13 ever -- that he had worked in where he was in a
- 14 position of authority, he took money.
- 15 Q. Did you ever share with her any of your
- 16 documentation regarding the drug fund?
- 17 A. No.
- 18 Q. Anything else you can recall about those
- 19 conversations between March of '04 and October of
- 20 '04?
- 21 A. Not at this time.
- 22 Q. Now, you have mentioned two in-person meetings
- 23 with Susan Wolford. One was when you went to her
- 24 house back in 2003 before she left North
- 25 Carolina?

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- 1 Q. So you went to the Sweet Tomatoes on Capital
- 2 Boulevard?
- 3 A. Yes.
- 4 Q. Do you recall if that dinner was before or after
- 5 your grievance hearing in October?
- 6 A. Before.
- 7 Q. Before, okay. Was it before or after your
- 8 discussion with the auditor in May?
- 9 A. I believe it was before.
- 10 Q. Did Chief Wolford know that you had a meeting
- 11 with Susan Wolford?
- 12 A. No.
- 13 Q. And then the next meeting that you had in person
- 14 with her was when?
- 15 A. I believe it was after May of 2004. She came
- 16 down to visit her friend Dawn again. And that
- 17 time we met for lunch at Wendy's in Henderson.
- 18 Q. And you said you thought that was after May of
- 19 2004?
- 20 A. I believe it was.
- 21 Q. Was before your grievance hearing in October of
- 22 2004?
- 23 A. Yes.
- 24 Q. Going back to the Sweet Tomatoes meeting, what
- 25 did you all discuss at that meeting?

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- 1 A. We talked about likes and dislikes in food.
2 There was more general conversation, what she was
3 doing, I believe her job. I believe she had
4 gotten a position at a hospital. I believe
5 that's what she said, and how Lauren was doing.
6 She did complain about John a little bit. I
7 don't believe it was too much. I believe that
8 she did say that Lauren was upset about the fact
9 of Kathy being in the house, so this -- being in
10 the house or seeing John. Or else, Lauren had
11 come down to visit him, and she caught John and
12 Kathy in the bed together, and that was upsetting
13 to her. That's what it was.
14 Q. So Susan Wolford told you that prior to May of
15 2004 -- or she told you prior to May of 2004 that
16 her daughter had caught Kathy Jenkins and---
17 A. This was after May of 2004, I believe -- no, no.
18 No, it wasn't. The meeting at Wendy's was after
19 May of '04, yes. This meeting, the dinner, yes.
20 Q. And at the dinner meeting Ms. Wolford was upset
21 about the fact that her daughter had caught John
22 and Kathy in the bed?
23 A. Yes. And it surprised me that she said all of
24 that in front of Lauren.
25 Q. Lauren was there at the dinner?

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- 1 Q. Okay. And then shortly after that you had your
2 discussion with Mr. Winston, the auditor?
3 A. Yes.
4 Q. And then sometime that summer or after your
5 discussion with the auditor you all had lunch at
6 Wendy's in Henderson?
7 A. Yes.
8 Q. The Wendy's off of 8158
9 A. On Dabney Drive.
10 Q. Who was present at the lunch at Wendy's?
11 A. Just me and Susan. Lauren was with her, but she
12 was at the skating rink, so she met me for lunch
13 while Lauren was skating.
14 Q. And what was discussed at that lunch?
15 A. Some more of how John Wolford had mistreated
16 Susan and what he was doing and not paying his
17 child support, and more talk about Kathy and
18 infidelity, that type of conversation.
19 Q. Any further discussion about drug fund or your
20 meetings with the auditor?
21 A. I don't recall saying anything about that. It
22 was all basically about Susan.
23 Q. All right. And at that point, other than the
24 people within the department that we've talked
25 about this morning, and the auditor, had you

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- 1 A. She sure was.
2 Q. Okay. Did Lauren seem upset by the discussion?
3 A. If she was, she didn't show it.
4 Q. All right. Anything else you all discussed at
5 Sweet Tomatoes?
6 A. Not that I can recall.
7 Q. Did you discuss with her at that point your
8 concerns about the drug fund?
9 A. I don't think we talked too much more about it.
10 I didn't say too much, because Lauren was there.
11 I didn't say any -- I don't recall mentioning
12 it -- mentioning it in front of Lauren.
13 Q. And who paid for dinner?
14 A. My husband.
15 Q. Your husband was with you?
16 A. Yes.
17 Q. Anybody else with you?
18 A. No, just the four of us.
19 Q. And then you went shopping at the bookstore?
20 A. Uh-huh.
21 Q. Did you guys purchase anything there?
22 A. Lauren did.
23 Q. Did she pay for it herself, or did you pay for it
24 for her?
25 A. No, Susan did.

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- 1 spoken to anyone else about your concerns about
2 the drug fund?
3 A. I don't recall at this time, at this time.
4 Q. What about Frank Strickland, had you spoken with
5 him by that point?
6 A. Yes.
7 Q. When did you first speak with Frank Strickland
8 about your concerns?
9 A. June of 2004.
10 Q. Tell me about that conversation. How did that
11 occur?
12 A. This happened in June 2004. I was -- I was
13 really upset, because I was -- I was afraid. I
14 was afraid, because I knew Wolford was now coming
15 after me. So I called Mr. Strickland, because I
16 knew he had tried to help Lyle. And I asked him,
17 I said, "Mr. Strickland, is it -- is it
18 appropriate for a Chief to take money out of a
19 fund."
20 And at this time I knew the Chief had given
21 a reason saying that he was conducting his own
22 private investigation. So I said that to Frank
23 Strickland, and Strickland told me no.
24 He said, "That would be very unethical." And he
25 said, "If he's the keeper of the fund" -- is how

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- 1 he put it. John Wolford was the auditor of the
 2 fund, and he maintained it. He said, "If he is
 3 all that then it's -- it's not proper or
 4 appropriate for him to extract money."
 5 Q. Did you share with Mr. Strickland at that point
 6 the documentation that you had?
 7 A. No. Now, do you -- can you be a little more
 8 clear about that? Like, for instance, are you
 9 talking about paperwork, or are you talking about
 10 verbally?
 11 Q. Well, I'm actually talking about both. But let's
 12 break them out.
 13 A. Okay.
 14 Q. Did you share with Mr. Strickland what was in the
 15 documentation, did you share with him orally what
 16 was in the documentation that you had?
 17 A. Yes, I did.
 18 Q. Did you actually verbatim read it to him?
 19 A. Yes, I did.
 20 Q. Did you record that conversation?
 21 A. No.
 22 Q. Did you record any of your conversations with
 23 Susan Wolford?
 24 A. No.
 25 Q. All right. Do you know if Mr. Strickland

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- 1 (The notes dated 7/14/03 are marked as
 2 Deposition Exhibit Number 10.)
 3 Q. I'm going to show you what we've marked as
 4 Exhibit Number 10. Is Exhibit Number 10 the
 5 notes that you're referring to that you made
 6 after your first discussion with Susan Wolford?
 7 A. I'm sorry, Ms. Davis. Did you ask me a
 8 question?
 9 Q. I did.
 10 A. I'm sorry.
 11 Q. That's okay. If that only happens once today
 12 that will be perfect. Let me try that again.
 13 A. Okay.
 14 Q. Okay. Exhibit Number 10---
 15 A. Yes, na'an.
 16 Q. Have you had a chance to review it?
 17 A. Yes, na'an.
 18 Q. Is Exhibit Number 10 the notes that you referred
 19 to earlier today that you made shortly after your
 20 first conversation with Susan Wolford?
 21 A. Yes, they are.
 22 Q. Thank you. I'm going to show you what we're
 23 marking as Exhibit Number 11. Is Exhibit Number
 24 11, Ms. Iglesias, the affidavit that Ms. Wolford
 25 signed for you up in Colonial Heights in October

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- 1 recorded your conversation with him about this
 2 information?
 3 A. No, I don't.
 4 Q. So you read to Mr. Strickland verbatim the
 5 documentation that you had compiled about the
 6 drug fund, is that correct?
 7 A. Correct.
 8 Q. And when we're talking about the documentation
 9 we're talking about a copy of the drug fund
 10 ledger, correct -- the printout from the
 11 computer?
 12 A. Uh-huh.
 13 Q. And your handwritten notes on receipts, et
 14 cetera, regarding your concerns?
 15 A. At that time all I read to him was what was on
 16 the ledger sheet.
 17 Q. So you read to him verbatim what was on the
 18 ledger sheet?
 19 A. Yes.
 20 MS. DAVIS: Let me take just a minute
 21 and mark an exhibit, if we could. I'm going
 22 to mark a series of exhibits. We want to
 23 take five minutes and go off the record.
 24 (A recess is taken from 2:20 to 2:32 p.m.)
 25 Pages 143 through 157 are marked confidential.

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- 1 of 2004 that we were talking about earlier today?
 2 (The affidavit dated 10/11/04 is marked as
 3 Deposition Exhibit Number 11.)
 4 A. This is the affidavit that Susan typed and signed
 5 and presented to me when I arrived in Colonial
 6 Heights.
 7 Q. I'm looking at the second page of Exhibit Number
 8 11, which has at the bottom of it number 210.
 9 A. Uh-huh.
 10 Q. In about the middle of that page it has a
 11 signature of a Paula S. Wolford. Is that the
 12 person that we've been referring to as Susan
 13 Wolford?
 14 A. That is correct.
 15 Q. And "S" standing for Susan to the best of your
 16 knowledge?
 17 A. Correct.
 18 Q. And looking at the second and the third full
 19 paragraph of Exhibit Number 11 on page 1, if you
 20 would, take a moment to read the second and third
 21 paragraph.
 22 A. (The witness complies with request.) Okay.
 23 Q. Do paragraphs two and three of Exhibit Number 11
 24 refresh your recollection about the time period
 25 during which Ms. Wolford relayed to you

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- 1 statements had been made to her by Chief Wolford
2 about his dislike for you?
3 A. Not really, because Susan and I didn't talk much
4 after -- after she left we talked maybe once,
5 because I know she called and asked about an
6 attorney. And then after that she didn't say
7 anything until 2004 when we talked, and that's
8 when she did say -- say these things. And then
9 she really said -- she said -- some of this I did
10 not know about until actually October of 2004.
11 Q. So she didn't tell you about these things until
12 sometime in 2004?
13 A. Not in this manner, I knew some things but not
14 all of this.
15 Q. And just to be clear, 2004 is when she told you
16 about these things, not when she said they
17 actually occurred. Am I correct about that?
18 A. Correct, that's correct.
19 Q. And looking down at paragraph number five, which
20 starts, "My husband John is very close friends
21 with"---
22 A. Okay.
23 Q. Do you see which paragraph I'm referring to?
24 A. Yes, ma'am.
25 Q. All right. If you would, take a moment to read

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- 1 be a true and accurate copy of correspondence
2 that you sent to Susan Wolford on or about
3 November the 7th, 2005?
4 A. Yes, it does.
5 Q. And pages 2, 3, and 4 of Exhibit 12 numbered 214,
6 215, and 216, does that appear to be an accurate
7 copy of an affidavit that you prepared and asked
8 Ms. Wolford to sign for you?
9 A. No. This is not -- this is an example. These
10 are the questions that I was hoping she would be
11 able to answer. I don't really -- this is not
12 actually an affidavit. These are questions.
13 Q. So you would describe the second, third, and
14 fourth pages of Exhibit 12 as a list of questions
15 you were asking Ms. Wolford to answer for you?
16 A. Uh-huh.
17 Q. Is that a yes?
18 A. I'm sorry. Yes, it is. Yes. I'm sorry.
19 Q. Okay. And did Ms. Wolford ever answer these
20 questions for you?
21 A. No.
22 Q. Have you heard from Ms. Wolford since you sent
23 this letter on November the 7th, 2005?
24 A. We talked one time after this, and I asked her if
25 she had received it. And she said yes, and that

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- 1 that paragraph.
2 A. All right. (The witness complies with request.)
3 Q. Do you have any knowledge as to what time
4 frame she's referring to when she says that
5 Lieutenant Glen Boyd, her husband John, and Don
6 Jenkins, when they would get together socially
7 they would make very negative comments about
8 Sharon discussing how much they did not like her
9 and how they wanted to get rid of her?
10 A. That to me would be probably 2002, probably
11 starting in 2002-2003, probably there on up. I
12 could tell a difference.
13 Q. In 2002 and 2003?
14 A. Yes.
15 Q. In any event, for Ms. Wolford to have had
16 knowledge of it those would have had to have
17 occurred before she left North Carolina, correct?
18 A. Oh, yeah.
19 (The letter and attached affidavit are
20 marked as Deposition Exhibit Number 12.)
21 Q. Okay, Ms. Iglesias. I'm going to show you what
22 we're marking as Deposition Exhibit Number 12.
23 Take a look at that for me, please.
24 A. (The witness reviews document.) Okay.
25 Q. Deposition Exhibit Number 12, does that appear to

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- 1 she would do the best she could in responding.
2 And that was the last I heard from you.
3 Q. And she never did respond?
4 A. No.
5 Q. And the last page of Exhibit Number 12, that's a
6 copy of the check you sent to Ms. Wolford for
7 notary fees, et cetera?
8 A. Correct.
9 Q. And Ms. Wolford did cash the check?
10 A. Correct.
11 Q. Okay. Now, in -- I believe we've talked about
12 all the discussions that you've had with anybody
13 about your suspicions about the drug fund where
14 the Chief was taking money from the drug fund up
15 and until October of 2004. Am I correct?
16 A. I believe that to be correct.
17 Q. After October of 2004, can you just list for me
18 anyone else that you have discussed your concerns
19 about the drug fund with?
20 A. When I came back, I believe, at the end of
21 October of 2004 -- when I came back to work at
22 the police department my office had been moved.
23 I had received a letter from Tommy Marrow telling
24 me that I was to be reinstated, and the letter
25 was a final warning. And when I came back to

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- 1 work several had questions about where I had been
- 2 and what had happened, what was going on. One
- 3 was Ronnie Davis. The other was Shelly Chaveaux.
- 4 I believe the other was Mark Blair. I believe
- 5 there were a couple of officers. I believe it
- 6 was Gary Ward, Eric Coghill, and that's all I can
- 7 recall -- Kenneth Woodlief, and that's all I can
- 8 recall at this time.
- 9 Q. So in about October of 2004 when you came back to
- 10 work after being transferred to dispatch and then
- 11 being on paid administrative leave, that's the
- 12 time period we're talking about, is that correct?
- 13 A. Correct.
- 14 Q. When you came back you talked to Ronnie Davis,
- 15 Shelly Chaveaux, Mark Blair, Eric Coghill -- I'm
- 16 sorry. I didn't get Officer Ward's name.
- 17 A. Gary.
- 18 Q. Gary Ward and Kenneth Woodlief?
- 19 A. Kenneth Woodlief. Not all at one time, I didn't
- 20 talk to them all at one time.
- 21 Q. But you talked to them around that time period?
- 22 A. Around that time period, yes.
- 23 Q. Tell me what Ronnie Davis's position is with the
- 24 Oxford PD.
- 25 A. Building maintenance.

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- 1 that I had been accused of breach of
- 2 confidentiality and that I had a grievance
- 3 hearing and that I had been reinstated, that I
- 4 believed it was all due to the fact that I had
- 5 discovered the Chief had been taking money out of
- 6 the drug fund.
- 7 Q. So you told Ronnie Davis at that point that you
- 8 believed that the real reason you had been
- 9 disciplined was because you had discovered the
- 10 Chief taking money out of the drug fund?
- 11 A. Yes. I saw it as retaliation.
- 12 Q. Why did you share that with Ronnie Davis?
- 13 A. He asked me, I told him.
- 14 Q. Mr. Davis didn't have any authorization to
- 15 investigate or take disciplinary action, did he?
- 16 A. No.
- 17 Q. And he wasn't in the chain of command?
- 18 A. No.
- 19 Q. All right. And at the time you shared that with
- 20 Mr. Davis you had received a final warning about
- 21 confidentiality, an I correct?
- 22 A. I had -- I had received a letter that stated,
- 23 "Reinstatement and Final Warning and Warnings."
- 24 And also a paragraph in there that said I had a
- 25 right to speak out on matters of public concern.

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- 1 Q. He's not a sworn officer?
- 2 A. Excuse me. No, he's not.
- 3 Q. And what is Shelly Chaveaux's position?
- 4 A. Shelly is a detective, investigation division.
- 5 Q. Okay. And Mark Blair is a detective as well?
- 6 A. Correct.
- 7 Q. Eric Coghill?
- 8 A. Corporal.
- 9 Q. Gary Ward?
- 10 A. Corporal.
- 11 Q. Kenneth Woodlief?
- 12 A. Parking ticket attendant.
- 13 Q. Is Mr. Woodlief a sworn officer?
- 14 A. No.
- 15 Q. All right. And tell me what you recall about
- 16 your conversations with Ronnie Davis after
- 17 October of 2004, or during that time frame.
- 18 Excuse me.
- 19 A. Right. That's all right. Ronnie came in my
- 20 office, the new office, and made comments about
- 21 my new office. And I had been moved on to the
- 22 other side of the building, and he said, "What
- 23 happened?"
- 24 And I said, "Well, I've been out on leave."
- 25 I said, "There's been some problems." I told him

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- 1 yes.
- 2 Q. So your answer to my question is yes?
- 3 A. Yes.
- 4 Q. Anything else you recall about your conversation
- 5 with Mr. Davis?
- 6 A. At that time, no.
- 7 Q. When you spoke to Mr. Davis at that time, did you
- 8 share with him that the Chief had provided you
- 9 with an explanation for every withdrawal?
- 10 A. Oh, no. No.
- 11 Q. Did you share with him that the Chief had told
- 12 you in May of 2004 that the reason he had taken
- 13 the money without your signature or your
- 14 knowledge was because he was conducting and
- 15 internal investigation with regard to the
- 16 department?
- 17 A. I don't recall telling Ronnie that.
- 18 Q. Okay. Is there anything else you recall about
- 19 your conversation with Mr. Davis?
- 20 A. Not at this time, no.
- 21 Q. Did you have any conversations with Mr. Davis
- 22 after October of '04 that you can recall?
- 23 A. Ronnie and I had many conversations.
- 24 Q. All of them about this topic?
- 25 A. Oh, no. Our conversations were centered around

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1 the Bible. Ronnie is -- Ronnie claims that he is
2 a minister, and I do a lot of study in Greek and
3 Jewish history and culture, plus the Bible. And
4 so we had a lot of conversations about that.
5 Q. Well, I'm only here today to talk to you about
6 the conversations you had that were work-related?
7 A. Correct.
8 Q. So tell me, if you will, any conversation that
9 you recall having with Ronnie Davis about your
10 concerns about the Chief and drug fund.
11 A. Okay. Well, like I said, there were many
12 conversations, and I cannot remember other than
13 actually what I've already told you. That was
14 the basis of our conversations. I did not share
15 documents with Ronnie. I did not show documents
16 to Ronnie. And I believe that I did eventually
17 tell Ronnie that I had overhead phone calls that
18 really made me very suspicious. And that was
19 about the extent of it at that time.
20 Q. And you're 100 percent sure that you did not
21 confide in Ronnie what you knew about work---
22 Excuse me. ---what the Chief had told you about
23 the reason he was taking money out of the drug
24 fund, that is that there was an internal
25 investigation going on with regard to his

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1 Q. And on each occasion after that -- you said you
2 had many conversations with Ronnie Davis. On
3 each occasion after that, prior to discussing it
4 with him, did he ask you about it?
5 A. Not too much after that.
6 Q. But you continued to have discussions with him?
7 A. Occasionally, not very much. And they were not
8 very lengthy.
9 Q. Anything else you can recall about your
10 conversations with Ronnie Davis?
11 A. Not at this time.
12 Q. And you don't ever recall sharing documents with
13 him?
14 A. Oh, no.
15 Q. What about Detective Chaveaux?
16 A. Shelly. Shelly wanted to know the same thing,
17 "Where have you been? What's been going on?"
18 And I told her the same thing, the same thing I
19 told Ronnie.
20 Q. And your purpose for telling her was?
21 A. Because she asked me.
22 Q. She had no authorization to investigate?
23 A. None.
24 Q. She had no disciplinary authority?
25 A. No.

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1 officers?
2 A. I do believe I did tell him later on.
3 Q. So you did tell Ronnie that the Chief's reason---
4 A. I told Ronnie the Chief claimed that he was doing
5 his own personal private investigation.
6 Q. But you didn't believe that?
7 A. No, I didn't.
8 Q. Did you tell Ronnie you didn't believe it?
9 A. Yes, I did.
10 Q. Did you ask Ronnie to do anything for you?
11 A. No.
12 Q. Did you, at any point, ask Ronnie to go to the
13 black ministers and ask them to rally,
14 essentially, against the Chief?
15 A. No.
16 Q. Did you ask him to spread the word about what you
17 knew about the Chief or what you suspected about
18 the Chief taking money from the drug fund around
19 the black community?
20 A. No.
21 Q. And your purpose for talking to Ronnie about this
22 topic was because he asked you. Is that what I
23 understood?
24 A. He came in and asked me, yes, asked me where I
25 had been.

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1 Q. And she wasn't in the Chief's chain of command?
2 A. No.
3 Q. Did you share with her anything related to the
4 phone conversations?
5 A. No.
6 Q. Did you share with her any documentation?
7 A. No, documentation. I may have told her about the
8 phone conversations, verbally.
9 Q. Did you tell her about the Chief's explanation?
10 A. Yes, that he claimed he was doing his own private
11 personal investigation.
12 Q. Did you have any other conversations with
13 Detective Chaveaux after this initial
14 conversation---
15 A. Many, many conversations. Shelly would come to
16 see me after the Chief would leave the building.
17 Q. And what was her purpose in coming to see you?
18 A. Just to talk, just to visit.
19 Q. To talk about the Chief?
20 A. No. Not all the time, no.
21 Q. But sometimes?
22 A. Occasionally, yeah.
23 Q. Did Shelly have her own concerns about the Chief?
24 A. No. She never said anything.
25 Q. Did you ever tell Detective Chaveaux that you

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- 1 thought the Chief was dishonest?
- 2 A. Oh, yes, I did.
- 3 Q. Did you ever tell Ronnie Davis you thought the
- 4 Chief was dishonest?
- 5 A. Yes, I did.
- 6 Q. Do you recall telling either of them that the
- 7 Chief was untrustworthy?
- 8 A. I don't recall saying that, but I do believe him
- 9 to be untrustworthy.
- 10 Q. Do you recall telling either of them that the
- 11 Chief had lied?
- 12 A. In my opinion he had lied.
- 13 Q. Do you recall telling either Mr. Davis or
- 14 Detective Chaveaux that the Chief had lied?
- 15 A. I don't recall telling them that.
- 16 Q. Any other information that you recall telling
- 17 Detective Chaveaux?
- 18 A. Not at this time.
- 19 Q. And did you ask Detective Chaveaux to do anything
- 20 with regard to the information you conveyed to
- 21 her?
- 22 A. No.
- 23 Q. And what about Mark Blair? Tell me about the
- 24 conversations with Mark Blair.
- 25 A. Blair came to see me, and he was sympathetic to

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- 1 the fact of what I had been through, so to speak.
- 2 And he wanted to know what had happened, and I
- 3 told him the same thing. And he wanted to know
- 4 if I had documented everything as he had advised
- 5 me to, and I said I did. And we didn't talk very
- 6 much. In fact, after that initial good to have
- 7 you back, how was it, you know, and are you okay
- 8 type of conversation, we didn't talk about it
- 9 anymore very much that I can recall. After that
- 10 it was work, we talked about work.
- 11 Q. Did you ever share your documentation with
- 12 Detective Blair?
- 13 A. No.
- 14 Q. Did you ever talk to Detective Blair about the
- 15 phone conversations?
- 16 A. I may have mentioned it to him. I don't recall,
- 17 but I may have mentioned it to him.
- 18 Q. Do you recall telling Detective Blair about the
- 19 Chief's explanation for taking the money out of
- 20 the drug funds?
- 21 A. Yes, I did.
- 22 Q. Do you recall what Detective Blair's response
- 23 was?
- 24 A. I do not. I don't recall what he said.
- 25 Q. Do you believe the Chief was conducting an

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- 1 internal investigation of his officers?
- 2 A. No.
- 3 Q. Did the Chief ever tell you what officer or
- 4 officers he supposedly was investigating?
- 5 A. No.
- 6 Q. Do you have any knowledge with regard to that at
- 7 all?
- 8 A. I heard a rumor.
- 9 Q. What was the rumor you heard?
- 10 A. The rumor that he was investigating Floyd
- 11 Griffin.
- 12 Q. Who did you hear that rumor from?
- 13 A. I don't know who it was from, but I know it was
- 14 out of the police department.
- 15 Q. All right. When you shared with Ronnie Davis,
- 16 Detective Chaveaux, and Mark Blair---
- 17 A. Excuse me. I remember now. It was Mark Blair.
- 18 Q. Mark Blair told you?
- 19 A. Mark Blair, yeah. Mark Blair mentioned that.
- 20 Q. So Mark Blair told you when that he had heard --
- 21 let's back up. What did Mark Blair tell you, as
- 22 best you can recall?
- 23 A. I cannot be sure. I cannot be definite. I just
- 24 remember that it was Floyd Griffin.
- 25 Q. And as best you recall, it was Mark Blair that

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- 1 told you---
- 2 A. As best I can recall, but I am not sure. I do
- 3 know it was a rumor in the department.
- 4 Q. So there was a rumor in the department that you
- 5 heard when?
- 6 A. In 2000 -- it was either -- I believe it was
- 7 2005.
- 8 Q. After you had already been back to work for a
- 9 while?
- 10 A. Yeah. I believe that to be correct.
- 11 Q. So sometime in 2005 you heard a rumor that the
- 12 Chief had been investigating an officer back in
- 13 2004?
- 14 A. No. All I heard was that there was an
- 15 investigation or that there had been talk of an
- 16 investigation surrounding Floyd Griffin.
- 17 Q. So sometime in 2005 you heard that there had
- 18 either been an investigation or talk of an
- 19 investigation of Floyd Griffin?
- 20 A. Correct. Correct.
- 21 Q. And you're not sure who you heard that from?
- 22 A. I cannot be sure.
- 23 Q. And after hearing that there had either been an
- 24 investigation or talk of an investigation of
- 25 Floyd Griffin, you still did not believe the

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- 1 Chief had actually engaged in an investigation?
- 2 A. No.
- 3 Q. All right. Back to your initial discussion in
- 4 October of 2004 with Mark Blair, you did not show
- 5 him any documents at that time?
- 6 A. At any time.
- 7 Q. Did you ask Mark Blair to do anything?
- 8 A. No.
- 9 Q. Did Mark Blair give you any advice about what you
- 10 ought to do?
- 11 A. No. No, not at that time.
- 12 Q. Do you recall telling Mark Blair that you thought
- 13 the Chief was dishonest?
- 14 A. Oh, yes.
- 15 Q. How many times?
- 16 A. How many times did I tell him that John Wolford
- 17 was dishonest?
- 18 Q. Uh-huh -- yes, ma'am. I'll follow my own rules,
- 19 I promise.
- 20 A. I don't know. I don't know. I don't know how
- 21 many times.
- 22 Q. Several times?
- 23 A. I wouldn't say several. You know, once kind of
- 24 gets the message across.
- 25 Q. And do you recall telling Mark Blair that you

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- 1 the Chief was a liar?
- 2 A. Yes.
- 3 Q. Did you show Eric Coghill any documentation?
- 4 A. No.
- 5 Q. Did you discuss with him the alleged reasons for
- 6 the withdrawals from the drug fund?
- 7 A. Yes.
- 8 Q. Did Officer Coghill opine on those reasons?
- 9 A. I don't recall that he did. If he -- I'm sure he
- 10 made a comment, is what I'm trying to say. I
- 11 just don't recall what his comment was.
- 12 Q. Do you recall telling Officer Coghill that you
- 13 didn't believe that the Chief had done an
- 14 investigation?
- 15 A. Yes.
- 16 Q. Anything else you can recall about your
- 17 conversations with Eric Coghill?
- 18 A. Yes. Eric came to me in late 2005 right after
- 19 Thanksgiving -- well, no, prior to Thanksgiving.
- 20 It was prior to Thanksgiving.
- 21 Q. Around November the 18th?
- 22 A. No. I believe it was before that. And he -- he
- 23 suggested to me that I go to WRAL. You know,
- 24 Ms. Davis, I am not clear if it was prior to --
- 25 I'm thinking now it was after Thanksgiving. I

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- 1 thought the Chief was a liar?
- 2 A. I believe -- I'm sure I did, because I believe
- 3 John Wolford to be a liar, yes.
- 4 Q. Anything else you recall about your conversations
- 5 with Mark Blair?
- 6 A. Not at this time.
- 7 Q. How about your conversations with Eric Coghill?
- 8 A. The conversations with Eric Coghill were
- 9 basically the same as they were Shelly Chaveaux
- 10 and Mark Blair. He came to my office, and he was
- 11 asking questions, and I told him.
- 12 Q. And again, Officer Coghill had no authorization
- 13 to investigate?
- 14 A. No.
- 15 Q. You didn't ask him to investigate?
- 16 A. No.
- 17 Q. He had no disciplinary authority over the Chief?
- 18 A. No.
- 19 Q. And had -- was not in the Chief's chain of
- 20 command?
- 21 A. No.
- 22 Q. Did you also tell Eric Coghill that you thought
- 23 the Chief was dishonest?
- 24 A. Yes.
- 25 Q. Did you also tell Eric Coghill that you thought

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- 1 believe now it was after Thanksgiving that Eric
- 2 came to me and made that suggestion, because we
- 3 had a luncheon on Thanksgiving or close to
- 4 Thanksgiving, that week of. And that is the
- 5 luncheon, the meeting that the Chief called me a
- 6 liar and a slanderer in front of the officers.
- 7 And Eric was one of the officers that told me
- 8 that the Chief had done this, and another officer
- 9 told me that as well.
- 10 Q. So Eric Coghill told you that the Chief had
- 11 called you a liar and a slanderer?
- 12 A. Yes, in a meeting that he had with sworn
- 13 officers.
- 14 Q. Before Thanksgiving of 2005?
- 15 A. It was the week of Thanksgiving. We had the
- 16 luncheon.
- 17 Q. And another officer also told you that. Who was
- 18 that officer?
- 19 A. Gary Ward.
- 20 Q. And was there something that precipitated this
- 21 discussion that you're aware of?
- 22 A. I would only be assuming.
- 23 Q. Well, tell me what you assume.
- 24 A. There had been an election that year, 2005, of
- 25 mayors, the mayors race among, I think,

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1 commissioners as well. And after the election Al
2 Woodlief was reelected. And I believe that the
3 Chief felt free in making those comments because
4 he knew there would be no recourse from
5 management on his part. And he was obviously out
6 to get rid of me.
7 Q. So as of November of '05 you felt that the Chief
8 was out to get rid of you?
9 A. Oh, long before that I felt that.
10 Q. Well, according to Susan Wolford's affidavit he
11 had stated that as early as 2003, correct?
12 A. That's correct.
13 Q. After you heard from Eric Coghill and Gary Ward
14 that the Chief had called you a liar and a
15 slanderer, did you come to any conclusions about
16 whether or not you could continue to work in the
17 department?
18 A. No. I came to the conclusion that people needed
19 to know that -- you know, I came to the
20 conclusion that there was not going to be an
21 investigation. Claims that they had made
22 concerning or claiming that they had
23 investigated, I did not believe them to be true.
24 And so I decided that embezzlement and basically
25 all that had had happened was a matter of grave

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1 Q. So in November of '05, did anyone else other than
2 Eric Coghill and Gary Ward tell you that the
3 Chief had called you a liar and a slanderer in
4 the meeting?
5 A. I don't recall anyone else telling me.
6 Q. And Eric Coghill suggested you go to WRAL?
7 A. Uh-huh -- yes. I'm sorry. Yes.
8 Q. That's good. Did he tell you why he thought you
9 ought to go to WRAL?
10 A. I believe he suggested that I might be able to
11 get help if I went to the public to voice a
12 public concern, that it was very important that
13 the people know. He said, "You" -- he basically
14 conveyed to me that I might be able to get help
15 that way, that there could be an investigation,
16 that it would cause an investigation and that the
17 truth would come out. And by "investigation" I'm
18 talking about an SBI investigation or another
19 outside police agency to investigate -- law
20 enforcement. Excuse me. Law enforcement agency
21 to come in and investigate.
22 Q. So the only type of investigation that you felt
23 was appropriate was an investigation by either
24 the SBI or another law enforcement agency?
25 A. Yes, I did because it was a criminal -- you know,

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1 public concern. And I believed going to WRAL
2 would present it to the people and hopefully
3 cause an investigation.
4 Q. So as of November 2005 you didn't believe that
5 any investigation had occurred?
6 A. That's correct.
7 Q. And as of November of 2005 you didn't believe --
8 excuse me. Let me back up. You didn't believe
9 that any investigation of the Chief had occurred?
10 A. That's correct.
11 Q. And as of November of 2005 you didn't believe
12 that the Chief had actually conducted an internal
13 investigation of one of his officers?
14 A. That's correct.
15 Q. And as of November 2005 you didn't believe the
16 Chief's statements about why he had taken money
17 from the drug fund?
18 A. That's correct.
19 Q. And as of November 2005 you didn't believe that
20 any of the discipline that had been taken against
21 you was related to anything other than the
22 allegations you had made against the Chief?
23 A. I believed all that had -- all of this action
24 against me was retaliation because I had reported
25 to the auditors my suspicions.

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1 embezzlement is a criminal act.
2 Q. All right. You also said you had some
3 conversations with Gary Ward in October of '04.
4 Tell me about those conversations.
5 A. They were the same, the same as Eric. It's,
6 "Where have you been?" It was -- I relayed to
7 him the same information.
8 Q. Did Gary Ward -- did you show Gary Ward any
9 documentation?
10 A. No.
11 Q. Did you share with Gary Ward the Chief's
12 explanation for why the monies were taken from
13 the drug fund?
14 A. I believe I did.
15 Q. Did you share with Gary Ward the phone
16 conversations that you had overheard?
17 A. Yes, I believe I did.
18 Q. Did you ask Gary Ward to do anything?
19 A. No.
20 Q. And Gary Ward had no authorization to
21 investigate?
22 A. No.
23 Q. No disciplinary authority over the Chief?
24 A. No.
25 Q. And was not in the chain of command with regard

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- 1 to the Chief?
- 2 A. No.
- 3 Q. Did you tell Gary Ward that you thought the Chief
- 4 was dishonest?
- 5 A. Yes.
- 6 Q. Did you tell Gary Ward that you thought the Chief
- 7 was a liar?
- 8 A. I'm sure I did.
- 9 Q. Anything else you recall about your conversations
- 10 with Gary Ward?
- 11 A. Not that I can recall right now.
- 12 Q. All right. And Kenneth Woodlief, the parking
- 13 ticket attendant, you had conversations with him
- 14 in October of 2004 or about that time frame?
- 15 A. Yes. Yeah, when I came back. Well, Mr. Woodlief
- 16 always came in to see me prior to and after.
- 17 Q. How long had Mr. Woodlief been employed with the
- 18 City?
- 19 A. I don't -- I don't remember. It hadn't been too
- 20 long.
- 21 Q. And Mr. Woodlief, again, was not a sworn officer,
- 22 is that correct?
- 23 A. No.
- 24 Q. And do you recall what your basic conversations
- 25 with Mr. Woodlief were?

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- 1 A. I don't recall. I don't recall doing that.
- 2 Q. Did you talk to any of the folks that we've just
- 3 discussed, Ronnie Davis, Shelly Chaveaux, Mark
- 4 Blair, Eric Coghill, Gary Ward, or Kenneth
- 5 Woodlief about the documentation that you had?
- 6 A. What was the first part of that question?
- 7 Q. Did you talk with any of them about the
- 8 documentation that you had?
- 9 A. Documentation as in---
- 10 Q. The document that we previously marked as
- 11 Exhibits 6, 7, and 9?
- 12 A. I believe I did, because I didn't believe -- I
- 13 mean, I did not share documents, but I'm sure I
- 14 mentioned the phone calls to a couple of them. I
- 15 know I did to Blair.
- 16 Q. Would it be fair to say that all of these folks,
- 17 as of October of 2004, Ronnie Davis, Shelly
- 18 Chaveaux, Mark Blair, Eric Coghill, Gary Ward,
- 19 and Kenneth Woodlief, were fairly clear you
- 20 didn't like the Chief?
- 21 A. I believe they would say that, yes.
- 22 Q. All right. And at the time you were having these
- 23 discussions with them they all worked with the
- 24 Chief in the Oxford Police Department, is that
- 25 correct?

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- 1 A. I didn't tell Mr. Woodlief -- I don't remember
- 2 telling him a whole lot, just that I had been on
- 3 leave and my basic reason was because -- because
- 4 they claimed I had breached confidentiality, and
- 5 I believed it to be for the reason that I had
- 6 reported the Chief for, misuse of funds.
- 7 Q. So you did tell Kenneth Woodlief that you
- 8 believed that the Chief had misappropriated
- 9 funds?
- 10 A. Yes.
- 11 Q. Did you tell him that you thought the Chief was
- 12 dishonest?
- 13 A. Yes. I conveyed that to him. I may not have
- 14 said, "I believe the Chief is dishonest," but I
- 15 conveyed it to him.
- 16 Q. Did you tell him that the Chief was a liar?
- 17 A. I said something like, "I don't believe he's
- 18 telling the truth."
- 19 Q. Did you tell Kenneth Woodlief the explanation
- 20 that the Chief had given you?
- 21 A. I don't remember telling him all that.
- 22 Q. Did you show Woodlief any documentation?
- 23 A. No.
- 24 Q. Did you talk to him about any of the
- 25 documentation you had?

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- 1 A. We all worked together, yes.
- 2 Q. And they all reported to the Chief?
- 3 A. Correct.
- 4 Q. Did you talk to any of these folks about your
- 5 belief that the Chief was an adulterer?
- 6 A. I don't recall doing that.
- 7 Q. Do you recall talking to any of them about your
- 8 suspicion that the Chief was either sleeping with
- 9 or living with the "newspaper woman," as you put
- 10 it, prior to getting married?
- 11 A. I don't think so. All of that occurred in 2003.
- 12 I don't -- I don't think I did, no. And it
- 13 was -- that was something that was all over the
- 14 department. The officers were talking about it
- 15 for quite some time. I mean, it had been awhile
- 16 back, you know.
- 17 Q. Other than the folks we've already talked about,
- 18 you have indicated that you also spoke to Jack
- 19 Carey, the SBI. Anyone else that we haven't
- 20 mentioned today that you talked to?
- 21 A. Pat Ford. Pat Ford, Detective Pat Ford.
- 22 Q. Detective Pat Ford.
- 23 A. Jason Tingon.
- 24 Q. Jason Tingon. Anyone else?
- 25 A. I don't recall anybody right now other than

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- 1 those.
- 2 Q. Okay. So we've got the ones we've already talked
- 3 about, plus we've got Jack Carey?
- 4 A. Uh-huh.
- 5 Q. We've got the SBI. And when you're talking about
- 6 the SBI you're talking about Teresa Vest?
- 7 A. Agent Vest.
- 8 Q. All right. Pat Ford and Jason Tingen?
- 9 A. Correct.
- 10 Q. All right. Anyone else you can recall talking to
- 11 about your suspicions about the Chief and the
- 12 drug fund?
- 13 A. Not at this moment.
- 14 Q. And of course, you talked to WRAL?
- 15 A. Yes.
- 16 Q. All right. And did you talk to any other news
- 17 media sources?
- 18 A. I spoke to Bill West
- 19 Q. He's with the Oxford Herald?
- 20 A. No. Bill West is with the Durham Morning Herald,
- 21 and I believe they bought out the Daily Dispatch
- 22 or something, or they have -- or are affiliated
- 23 with them. And I also spoke to Al Wheless, but I
- 24 believe that was---
- 25 Q. W-H-E-E?

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- 1 concerns?
- 2 A. Oh, yeah. Yeah.
- 3 Q. So the only conversation you've had with Frank
- 4 Strickland was in 2004?
- 5 A. No. I've had -- I've had a few conversations
- 6 with him.
- 7 Q. All right. I believe the only one you described
- 8 to me was a conversation that occurred between
- 9 March of '04 and October of '04, along about the
- 10 time you were talking to Ms. Wolford, Susan
- 11 Wolford?
- 12 A. June, I spoke to Frank in June.
- 13 Q. That was the first time you spoke to Frank
- 14 Strickland?
- 15 A. Uh-huh, concerning---
- 16 Q. And tell me -- Just list for me, if you will, all
- 17 the other times that you have talked to Frank
- 18 Strickland about your concerns in this regard.
- 19 A. Well, in 2004 it was probably quite a few times.
- 20 I would say at least once a week in 2004. And in
- 21 2005 we didn't -- probably in the earlier part of
- 22 the year we didn't talk very much. And later on,
- 23 when he started running for mayor, I did talk to
- 24 him when he was running mayor -- running for
- 25 mayor.

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- 1 A. W-H-E-L-E-S-S, Wheless.
- 2 Q. Wheless, okay. And who is Al Wheless?
- 3 A. He's a reporter with the Daily Dispatch. That
- 4 was after I had been terminated. I believe that
- 5 was after I had been terminated.
- 6 Q. Do you recall speaking to WTBD?
- 7 A. No.
- 8 Q. Do you recall sending any correspondence to any
- 9 other news sources?
- 10 A. I may have. I just don't recall who.
- 11 MS. DAVIS: Okay. Let's take a quick
- 12 break.
- 13 (A recess is taken from 3:50 to 4:05 p.m.)
- 14 Q. (By Ms. Davis) Okay, Ms. Iglesias. Before the
- 15 break you indicated that you had -- in addition
- 16 to the folks that we discussed earlier, you had
- 17 also spoken to Pat Ford, Jason Tingen, Jack
- 18 Carey, Agent Teresa Vest with the SBI, WRAL, Bill
- 19 Vest, and Al Wheless. Is there anybody else that
- 20 you have recalled since we took our break that
- 21 you have spoken to about your concerns about the
- 22 drug fund?
- 23 A. No.
- 24 Q. And have we covered all the conversations you
- 25 have had with Frank Strickland regarding your

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- 1 Q. You worked on his campaign, right?
- 2 A. Not -- not a whole lot. Some, yes. Some, as
- 3 much as I could.
- 4 Q. And Mr. Strickland was adamant that during his
- 5 campaign that if he was elected he would fire the
- 6 police chief, correct?
- 7 A. I don't know that.
- 8 Q. So you talked to him a lot during the campaign at
- 9 the latter part of 2005. How about 2006?
- 10 A. Yes. I talked to him in 2006.
- 11 Q. And if you would, describe for me the general
- 12 nature of the conversations you had with
- 13 Mr. Strickland in '04.
- 14 A. Well, I discussed with him my concerns about the
- 15 Chief taking money out of the drug fund, and
- 16 after that it was mostly -- I had asked him if he
- 17 could help me. He said he would see what he
- 18 could do. He tried to talk to some people, I
- 19 think, and he would call me back and ask me how I
- 20 was doing. And one time in particular was he
- 21 called me, and I believe it was around the first
- 22 part of August of '04, and told me that Jack
- 23 Carey had called him and told him to call me and
- 24 tell me that Tommy Marrow, John Wolford, and Don
- 25 Jenkins were going to set me up to be fired or

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- 1 either to lose my job.
- 2 Q. So in 2004?
- 3 A. August of -- the first part -- the first week in
- 4 August, probably.
- 5 Q. So August of '04 Strickland called you?
- 6 A. Yes.
- 7 Q. And by that point you had already talked to him
- 8 about your concerns?
- 9 A. Yes. That was in June.
- 10 Q. Uh-huh. And he said, "Jack Carey told me to tell
- 11 you"?
- 12 A. "To call you and tell you"---
- 13 Q. That Wolford, Jenkins, and Marrow were going to
- 14 set you up to be fired?
- 15 A. That's correct. He told me to be very careful,
- 16 to be on the lookout.
- 17 Q. Anything else you recall about your conversations
- 18 with Mr. Strickland in 2004?
- 19 A. When they set me up I did speak to Mr. Strickland
- 20 about it, and what they had done to me.
- 21 Q. And when was -- when do you contend that they,
- 22 quote, "set you up"?
- 23 A. It wasn't too long, probably a week maybe --
- 24 maybe a week or ten days after Strickland had
- 25 called me.

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- 1 administrative position with the police
- 2 department, were you not?
- 3 A. I was now administrative support specialist to
- 4 the Oxford Police Department.
- 5 Q. Did your job duties change from the time when you
- 6 were administrative assistant to the Chief?
- 7 A. Yes, they did.
- 8 Q. How did they change?
- 9 A. I didn't do as much for the Chief as I did
- 10 previously in my previously position. He did
- 11 most all of his own -- as far as I can remember
- 12 he did all of his own letters. He even made --
- 13 took care of some financial transactions with
- 14 City Hall Finance Department. He skipped over me
- 15 a lot and started doing a lot of his own work.
- 16 My duties as far as payroll were the same, and
- 17 several other things that were the same. The
- 18 basics of the position were the same a lot.
- 19 There was less contact with John Wolford and less
- 20 work concerning him. I did not answer the phone
- 21 as much. My phone didn't ring as much anymore.
- 22 Q. Any other differences?
- 23 A. Not that I can recall at this time. The letter
- 24 that I had received from Tommy Marrow was very
- 25 confusing in the fact that it was a reinstatement

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- 1 Q. So in August---
- 2 A. '04.
- 3 Q. ---September '04?
- 4 A. No. It was August '04.
- 5 Q. So you contend that in August of '04 that
- 6 Jenkins, Wolford, and Marrow set you up?
- 7 A. Yes, na'an.
- 8 Q. And I presume you're referring to the time period
- 9 when you were disciplined for discussing
- 10 personnel information?
- 11 A. That's what they said. That's what they claimed.
- 12 Q. And you were laterally transferred to the
- 13 position of dispatcher?
- 14 A. I was demoted to the position of dispatcher.
- 15 Q. Did you receive any reduction in pay?
- 16 A. No.
- 17 Q. All right. So when you were transferred to the
- 18 position of dispatcher you then grieved that
- 19 transfer?
- 20 A. Yes.
- 21 Q. And you were actually reinstated to your prior
- 22 position at the police department, is that
- 23 correct?
- 24 A. That is not correct.
- 25 Q. Okay. You were transferred back to an

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- 1 letter and a final warning all at the same time.
- 2 Q. And the final warning was with regard to what,
- 3 Ms. Iglesias?
- 4 A. What they claimed, their claims against me.
- 5 Q. Which was with regard to confidentiality, is that
- 6 correct?
- 7 A. That's correct.
- 8 Q. Okay. We were continuing to talk about your
- 9 discussions with Frank Strickland. In August of
- 10 2004 Mr. Strickland called you. Have you had any
- 11 discussions in 2004 after that discussion?
- 12 A. Yes, I'm sure we did.
- 13 Q. And what was the nature of those discussions?
- 14 A. Probably about the set up, what Wolford and
- 15 Marrow and Jenkins had set me up and what they
- 16 were doing to me.
- 17 Q. And Wolford -- I mean, excuse me. Strickland, in
- 18 fact, contacted the SBI for you, did he not?
- 19 A. Not to my knowledge.
- 20 Q. Did he contact Training & Standards?
- 21 A. I don't know that, that he did.
- 22 Q. Did he contact the U.S. Attorneys Office?
- 23 A. I don't know that he did.
- 24 MS. DAVIS: Can we go off the record
- 25 and let me mark a few exhibits, please?

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- 1 (A discussion was held off the record.)
 2 (The letter dated 9/8/04 is marked as
 3 Deposition Exhibit Number 13.)
 4 (The letter dated 9/7/04 is marked as
 5 Deposition Exhibit Number 14.)
 6 Q. Ms. Iglesias, we're back on the record. I'm
 7 going to ask you to take a look at Exhibits --
 8 what we've marked as Exhibits Number 13 and 14,
 9 which I will represent to you are copies of
 10 documents that were produced to me by your
 11 attorneys in discovery. Exhibit Number 13
 12 appears to be a letter to Scott Perry at the
 13 Director of Training and Standards from Frank
 14 Strickland. Does that refresh your recollection
 15 as to whether Frank Strickland contacted Training
 16 and Standards about your allegations concerning
 17 Chief Wolford?
 18 A. Well, it looks like he did. I just don't
 19 remember the letter.
 20 Q. Can you tell me how you got a copy of the letter?
 21 A. I'm sure Mr. Strickland sent me a copy. He would
 22 have to.
 23 Q. And taking a look at Exhibit Number 14---
 24 A. I do remember this one now. I remember this one.
 25 Q. That's Exhibit Number 14 you're referring to?

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- 1 very serious statements about your boss. I will
 2 not use those statements unless I have to. You
 3 may want to call her and talk to her. She really
 4 seems like a nice lady who has been victimized by
 5 Wolford."
 6 A. The question again?
 7 Q. Does this refresh your recollection with regard
 8 to whether or not Mr. Strickland suggested you
 9 have discussions with Susan Wolford?
 10 A. I mean, that might be a suggestion.
 11 Q. But at the time this e-mail was sent, which was
 12 October the 9th, 2004, you had already had
 13 discussions with Susan Wolford---
 14 A. Oh, yes.
 15 Q. Had you not?
 16 A. Yes.
 17 Q. Do you recall any other conversations you had
 18 with Mr. Strickland since -- in 2004? Excuse me.
 19 A. In 2004?
 20 Q. Yes.
 21 A. No. Basically it was about the setup, being set
 22 up and what was going on with that.
 23 Q. All right. And you said that in '05, the first
 24 part of '05, you didn't have many conversations
 25 with Mr. Strickland?

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- 1 A. I do.
 2 Q. All right. And does Exhibit Number 14 refresh
 3 your recollection as to whether Mr. Strickland
 4 contacted the U.S. Attorneys Office?
 5 A. It looks like he did.
 6 Q. And Mr. Strickland also suggested to you that you
 7 ought to have discussions with Susan Wolford, is
 8 that correct?
 9 A. That I ought to have discussions?
 10 Q. Yes.
 11 A. I don't recall him saying that to me, because I
 12 was already, you know, speaking to Susan up until
 13 November 2006.
 14 MS. DAVIS: Let's mark as Deposition
 15 Exhibit Number 15---
 16 (The E-mail dated 10/9/04 is marked as
 17 Deposition Exhibit Number 15.)
 18 Q. Ms. Iglesias, if you would, take a look at
 19 Deposition Exhibit Number 15.
 20 A. (The witness complies with request.)
 21 Q. If you would, look at the third to the last
 22 paragraph. It starts, "I sent you a copy of an
 23 e-mail that I had sent to T. Marrow just to let
 24 you know that you have a friend who is on your
 25 side. Wolford's wife called me and made some

SHARON IGLESIAS

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- 1 A. I don't recall many.
 2 Q. And the fall of '05 was an election year, is that
 3 correct?
 4 A. Correct.
 5 Q. Mr. Strickland ran against Al Woodlief for Mayor
 6 in that election?
 7 A. Correct.
 8 Q. And you supported Mr. Strickland for Mayor?
 9 A. Correct.
 10 Q. You had several conversations with Mr. Strickland
 11 in the fall of '05?
 12 A. Yes, correct.
 13 Q. All right. Talk to me about those conversations,
 14 please.
 15 A. Well, I don't know -- I don't recall what they
 16 were, but I know that I did speak to him.
 17 Q. Did you talk to him about your concerns about the
 18 department?
 19 A. Nothing other than what had already been
 20 discussed. They were my concerns.
 21 Q. Did you talk to him about your desire to the
 22 Chief fired?
 23 A. No.
 24 Q. Is it your testimony today that you've never told
 25 Frank Strickland that you would like to see Chief

SHARON IGLESIAS

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- 1 Welford fired?
- 2 A. No. My -- what I wanted was an investigation.
- 3 Q. Okay. And you never shared with Frank Strickland
- 4 or said anything along the lines of you share his
- 5 desire to see Chief Welford out of the position
- 6 of Chief of Police?
- 7 A. I don't recall that.
- 8 Q. All right. And Frank Strickland lost the
- 9 election, is that correct?
- 10 A. That's correct.
- 11 Q. You don't recall -- I believe you testified
- 12 earlier you don't recall Frank Strickland saying
- 13 during the election that one of the things he
- 14 would do if he were elected was to make sure that
- 15 Chief Welford was no longer Chief?
- 16 A. No.
- 17 Q. Now, I'm talking about the 2005 election.
- 18 A. Right. The only thing I recall him saying was
- 19 that he would do an investigation, he would make
- 20 sure an investigation was done, a proper one.
- 21 Q. And as of the fall of '05 you did not believe
- 22 that a proper investigation had been done?
- 23 A. No.
- 24 Q. And in fact, you didn't believe that any
- 25 investigation had been done?

SHARON IGLESIAS

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- 1 Q. He's provided you with documentation?
- 2 A. He has sent me e-mails. I get e-mails.
- 3 Q. Has he provided you with any financial support?
- 4 A. No.
- 5 Q. And Jack Carey has provided you with documents?
- 6 A. No.
- 7 Q. Jack Carey has provided you with information?
- 8 A. Information.
- 9 Q. Yes?
- 10 A. Yes.
- 11 Q. Has Jack Carey provided you with any financial
- 12 support?
- 13 A. No.
- 14 Q. Has any commissioner, current or former, of the
- 15 City of Oxford provided you with any financial
- 16 support?
- 17 A. No.
- 18 Q. Has any other person, other than yourself or your
- 19 immediate family, provided you with any financial
- 20 support---
- 21 A. No.
- 22 Q. ---with regard to your litigation---
- 23 A. No.
- 24 Q. ---against the City of Oxford?
- 25 A. I'm sorry. No.

SHARON IGLESIAS

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- 1 A. That's correct.
- 2 Q. But you had been told that several investigations
- 3 had been done?
- 4 A. That's what were the claims, yes.
- 5 Q. And you didn't believe any of those?
- 6 A. No.
- 7 Q. After Mr. Strickland lost the election, did you
- 8 have conversations with Mr. Strickland?
- 9 A. Oh, yes. I'm sure I did.
- 10 Q. Did Mr. Strickland contact WRAL for you?
- 11 A. No, I did. I contacted them.
- 12 Q. Did Mr. Strickland -- do you recall
- 13 Mr. Strickland offering to assist you in your,
- 14 quote, "battle," against the City?
- 15 A. Yes.
- 16 Q. When did Mr. Strickland offer to assist you in
- 17 your battle?
- 18 A. Well, he's been trying to help me since June
- 19 2004.
- 20 Q. And since 2005, since your termination in 2006,
- 21 has Mr. Strickland continued to assist you with
- 22 your litigation against the City of Oxford?
- 23 A. I think that he has, yes.
- 24 Q. He's provided you with information?
- 25 A. At times, yes.

SHARON IGLESIAS

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- 1 Q. All right, okay. Let's talk about discussions
- 2 with Pat Ford. How many discussions have you had
- 3 with Pat Ford with regard to your concerns about
- 4 the Chief?
- 5 A. I believe that started in May of 2004. It was
- 6 either during the time the SBI was there, or it
- 7 was around that time. And I told her what my
- 8 suspicions were concerning the Chief taking money
- 9 out of the drug fund, and she seemed to be upset
- 10 about it. Now -- now that I look back on it, I
- 11 believe she was not being honest. I'm sorry, go
- 12 ahead.
- 13 Q. Nope, that's fine. Go ahead.
- 14 A. She -- I discussed with her -- they were doing
- 15 the investigation, and I discussed with her
- 16 concerning Warren Hicks, his embezzlement. And
- 17 there was a receipt where Welford had given
- 18 Warren Hicks money out of the drug fund to cover
- 19 missing money out of the property and evidence
- 20 room, and she was very interested in that and
- 21 wanted to see it. I actually called her. I
- 22 called her and told her about it. She had
- 23 already gone home from work. I called her and
- 24 told her about it, and she said, "Okay. You
- 25 know, stop by on your way home."

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- 1 So I did, and I showed her the receipt and
2 my notes. I had my notes with me in my folder
3 concerning the meeting with Susan Welford in
4 2003.
5 Q. And in addition to your notes about the meeting
6 with Susan Welford -- and those notes I believe
7 were marked as Exhibit Number 12. Am I correct
8 about that?
9 A. 10.
10 Q. Excuse me, 10. The notes you're referring to
11 we've marked as Exhibit Number 10?
12 A. Yes.
13 Q. Did you also have copies of Exhibits Number 6, 7,
14 or 9 with you when you went to talk to Pat Ford?
15 A. No.
16 Q. Did you ever show Pat Ford copies of Exhibits 6,
17 7, or 9?
18 A. No.
19 Q. Okay. And when was this conversation with Pat
20 Ford when you showed her the notes, which we have
21 marked as Exhibit Number 10?
22 A. May 2004.
23 Q. Was this discussion with Pat Ford before or after
24 you talked to the auditor?
25 A. I cannot remember.

SHARON IGLESIAS

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- 1 A. Yeah. I felt kind of funny about it, and I
2 decided it was not a good idea to take her word
3 for it.
4 Q. In May of 2004, did you believe that Chief
5 Welford had engaged in criminal activity?
6 A. In May of 2004?
7 Q. Yes.
8 A. Yes.
9 Q. And you stated earlier today that you believed
10 that the criminal activities should have been
11 investigated by a law enforcement agency, is that
12 correct?
13 A. That's correct.
14 Q. All right. And in your opinion, does the
15 assistant DA qualify as a law enforcement agency
16 or agent qualified to conduct a criminal
17 investigation?
18 A. I don't believe they're sworn law enforcement.
19 Q. It's your understanding that the assistant DA
20 cannot engage in criminal investigations?
21 A. That would be my understanding, that they are not
22 sworn law enforcement.
23 Q. Is it your understanding that they can order a
24 criminal investigation if they see fit?
25 A. Yes.

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- 1 Q. Along about the same time?
2 A. Yes.
3 Q. Did you ask Pat Ford to do anything with regard
4 to those allegations?
5 A. I don't recall that I did. Pat suggested to me.
6 She said, "I'm going to Cindy Bostic and talk to
7 her about it." She and Cindy were friends.
8 Cindy is, I believe, an assistant DA. And so I
9 can only assume that Pat did that. She came
10 back, and I was out in the parking lot. And she
11 said that she had talked to Cindy, and she
12 suggested to me that I go and talk to her about
13 my concerns. And I told her no, that I wasn't
14 going to do that.
15 Q. So Pat suggested that you go talk to the
16 assistant DA?
17 A. Yes.
18 Q. And that's the assistant DA in Granville County?
19 A. Yes.
20 Q. And you told Pat that you were not going to do
21 that?
22 A. Right.
23 Q. And why did you decide not to do that?
24 A. I didn't trust Pat.
25 Q. This was in May of 2004?

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- 1 Q. Okay. So just so I understand, in May of 2004
2 you thought that criminal activity had occurred?
3 A. Yes.
4 Q. It was suggested to you by Pat Ford that you
5 ought to go talk to the assistant DA?
6 A. Uh-huh.
7 Q. You understood at that time that the assistant DA
8 could order a criminal investigation if they saw
9 fit?
10 A. I did not know that the assistant DA could. I do
11 know that the DA can.
12 Q. Well, the assistant DA works under the direct
13 supervision of the DA, correct?
14 A. Yes, I -- yes.
15 Q. And knowing all of that you declined to go talk
16 to Cindy Bostic?
17 A. That's correct.
18 Q. All right. Any other conversations you recall
19 with Pat Ford?
20 A. In August of 2004 Pat Ford came to my office.
21 She turned in lunch receipts where she had been
22 training and asked for reimbursement. So she sat
23 down, and she said to me all of a sudden -- she
24 said, "Did you hear that Melba Knott got fired
25 last week?"

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1 And I was getting money out of the safe to
2 reimburse her, and I -- it shocked me really bad
3 what she said. So I turned around and I said,
4 "What did you say?"
5 And she said, "Did you hear that Melba Knott
6 got fired last week?"
7 I said, "No." I said, "Pat, where did you
8 hear this from?"
9 And she said, "Well, I don't know. I don't
10 know." Then she stood up. She wanted to really
11 get out of my office. And then she was holding
12 out her hand for the money, so I handed her the
13 money, and she left.
14 Q. And what did you do after she left?
15 A. After she left I called the finance office and
16 spoke to Sultana Ferrell. And I asked Sultana, I
17 said, "Is Melba okay?"
18 And she said, "Yeah."
19 And I said, "Is she -- is she still there?
20 Is she working?" And Sultana said, "Yeah, she's
21 working."
22 And I told her, I said, "Well, Pat Ford just
23 left my office and just said to me, 'Did you know
24 that Melba Knott got fired last week?'"
25 And so Sultana made conversation about it.

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1 giving Warren Hicks money to cover missing money.
2 and I showed her that. And I had my notes with
3 me.
4 Q. And the notes that you had did not include
5 Exhibits Number 6, 7, or 9?
6 A. No.
7 Q. All right. Is there anything else you recall
8 about your discussions with Pat Ford?
9 A. Oh. Well, she was telling me some really
10 terrible things about -- about John Wolford and
11 Glen Boyd, talking about their sexual behavior.
12 Q. What did she tell you?
13 A. She said that John Wolford and Glen Boyd were
14 swapping -- well, it was John Wolford's
15 girlfriend, Kathy, and Glen Boyd's wife. And her
16 name is Sharon. They were swapping partners, and
17 that's what she told me. And she conveyed to me
18 an incident that happened at Christmas -- and I
19 don't recall what Christmas she was talking
20 about -- where they were over at Pat's house,
21 drinking. And there was a party -- I believe it
22 was Pat's house. And there was a party, and they
23 were drinking. And something was said. I
24 believe -- I believe it was Glen's wife.
25 Something was said, "Well, we've had too much to

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1 She said that was a terrible thing for her to
2 say, and she said, "I don't -- I've not heard any
3 such thing." She said, "You might want to call
4 Phyllis. She might know something."
5 So I called Phyllis, and I asked her the
6 same thing. And Phyllis said, "No. Everything
7 seemed to be fine over there," and that was the
8 end of it.
9 Q. Okay. Do you recall having any further
10 conversations with Pat Ford about your concerns
11 about the Chief taking money out of the drug
12 fund?
13 A. I don't recall at this time any other.
14 Q. Do you recall ever telling Pat Ford that you
15 thought the Chief had lied about taking money out
16 of the drug fund?
17 A. I'm pretty sure I did.
18 Q. And you do not recall sharing with Pat Ford any
19 documents related to your records of the Chief
20 taking money out of the drug fund?
21 A. No.
22 Q. Do you recall a time when you went to Pat Ford's
23 house to talk to her about your concerns?
24 A. No. I didn't go to her house to talk about my
25 concerns. I had a copy of a receipt of the Chief

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1 drink. We don't need to be driving back, or
2 driving that far" -- so it must have been Glen's
3 wife.
4 And Pat suggested that they could stay at
5 her place, and then Wolford suggested that, "No,
6 they can stay at our place."
7 And Glen's wife got upset and said, "No, I
8 am not going over there. I'm not staying over
9 there."
10 She insinuated that if she -- Pat was
11 insinuating to me that if Glen and his wife
12 stayed with Wolford that they would expect sexual
13 favors, I guess, or swapping. That's what she
14 was conveying to me.
15 Q. Did Pat specifically say that to you?
16 A. Yes.
17 Q. And I take it from the look on your face that you
18 don't approve of that kind of behavior?
19 A. No.
20 Q. And Pat told you that in 2004?
21 A. Yes, May of 2004.
22 Q. She told you all of that in May of 2004?
23 A. Yeah. She told me that the day I went over and
24 showed her the receipt.
25 Q. All right. Anything else you recall about your

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- 1 conversations with Pat?
- 2 A. No.
- 3 Q. And you believe that Pat Ford participated in
- 4 your setup in August of 2004, is that correct?
- 5 A. That's correct.
- 6 Q. Have you had conversations with Pat Ford since
- 7 August of 2004?
- 8 A. Not that I recall.
- 9 Q. Talk to me about your conversations with Jason
- 10 Tingen. When do you recall your first
- 11 conversation being with Jason Tingen about your
- 12 concerns with regard to the Chief?
- 13 A. 2004.
- 14 Q. All right. Before or after you talked to the
- 15 auditor?
- 16 A. Before.
- 17 Q. What was the nature of your conversations with
- 18 Jason Tingen?
- 19 A. I had asked Jason to be a witness in a meeting
- 20 between myself and Chief Wolford that was going
- 21 to take place on May the 13th, 2004. And I
- 22 briefly told Jason that I had spoken to auditors
- 23 that had come in and expressed that my concerns,
- 24 my suspicions, that he was removing money from
- 25 the drug fund. And Wolford was going to be

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- 1 of conversations that have been turned over to us
- 2 in discovery. Other than the recordings that
- 3 have been turned over in discovery, are there any
- 4 additional recordings that you've made that have
- 5 not yet been disclosed to your attorneys or to
- 6 us?
- 7 A. No.
- 8 Q. All right. Any other discussions you recall
- 9 having with Jason Tingen?
- 10 A. Not that I can recall.
- 11 Q. And neither Jason nor Pat Ford had any authority
- 12 to investigate the allegations against Chief
- 13 Wolford?
- 14 A. No.
- 15 Q. And they had no authorization to discipline the
- 16 Chief?
- 17 A. No.
- 18 Q. And they were not in the Chief's chain of
- 19 command?
- 20 A. No.
- 21 Q. Did you discuss with Jason Tingen or show him any
- 22 of the documents that have been marked as
- 23 Exhibits 6, 7, or 9 in this deposition?
- 24 A. No. No.
- 25 Q. Did you ask Jason to do anything?

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- 1 meeting with me, and I wanted a witness of my
- 2 choosing. And Jason agreed, and that was the
- 3 extent of that conversation.
- 4 Q. And did you have any conversations with Jason
- 5 Tingen after 2004?
- 6 A. After 2004?
- 7 Q. Yes. Excuse me. After that conversation in May
- 8 of 2004?
- 9 A. Yes.
- 10 Q. Talk to me about those conversations.
- 11 A. At some point in May of 2004 Jason came back to
- 12 me -- and I'm not sure if this was after -- I
- 13 believe this was after the City auditors, prior
- 14 to my meeting with John Wolford on May 13th.
- 15 Jason expressed a concern about me, and he said,
- 16 "You need to protect yourself." He suggested
- 17 that I buy a tape recorder.
- 18 Q. Did you buy a tape recorder?
- 19 A. Yes, I did.
- 20 Q. And did you begin recording your conversations?
- 21 A. Yes, I did.
- 22 Q. You began recording those sometime in May of '04,
- 23 is that correct?
- 24 A. That's correct.
- 25 Q. All right. And you recorded a substantial number

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- 1 A. Other than be a witness, no.
- 2 Q. Did you ever share with Jason the comments that
- 3 Pat Ford had made to you about the Chief's
- 4 lifestyle?
- 5 A. I don't recall that. I don't recall if I did or
- 6 if I didn't.
- 7 Q. And by "lifestyle," I mean the---
- 8 A. Right.
- 9 Q. The partner swapping that you referred to
- 10 earlier?
- 11 A. I don't recall if I did.
- 12 Q. Do you recall ever telling Jason that you thought
- 13 the Chief was a liar?
- 14 A. I don't recall if I said those exact words.
- 15 Q. Do you recall stating or implying to Jason that
- 16 you believed the Chief to be untrustworthy?
- 17 A. Yes, I probably did say that.
- 18 Q. Moving on to your next person on the list, which
- 19 is SBI agent Teresa West. Tell me about your
- 20 first conversation with Teresa West.
- 21 A. Teresa West called me in July.
- 22 Q. Of 2004?
- 23 A. 2004, around the end of the month and scheduled a
- 24 meeting with me in Raleigh.
- 25 Q. And you went to the meeting?

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- 1 A. I did.
- 2 Q. During the phone conversation to set up the
- 3 meeting, did you talk in substance about
- 4 anything?
- 5 A. I don't think so. I'm not sure about that.
- 6 Q. So you went to the meeting in Raleigh. Do you
- 7 know approximately what date that was?
- 8 A. Probably -- I'm going to say around July 23rd,
- 9 approximately.
- 10 Q. Did anyone come with you to the meeting?
- 11 A. No.
- 12 Q. Did you take any documents with you to the
- 13 meeting?
- 14 A. Yes.
- 15 Q. What documents did you take with you?
- 16 A. The documents -- the documents that you see in
- 17 Exhibit -- the documents, I had copies of the
- 18 documents that were in probably Exhibit 9.
- 19 Q. What about Exhibit 6, did you--
- 20 A. And -- yeah, Exhibit 6. Yeah, because I had the
- 21 two where he did not submit any explanation for
- 22 the \$20 and the \$60.
- 23 Q. So you actually took her the documents that are
- 24 marked as Exhibit 6 and Exhibit 7?
- 25 A. No. Exhibit 9, 6 and 9.

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- 1 Q. So you told her the whole story---
- 2 A. I told her my suspicions, yes.
- 3 Q. And she made notes?
- 4 A. Yes.
- 5 Q. All right. And then when is the next time you
- 6 talked to Teresa West?
- 7 A. She called me -- I believe she called me the
- 8 following week or not too long -- it wasn't too
- 9 long after that, and told me that she had talked
- 10 with the district attorney, Sam Currin, and that
- 11 he was not interested in doing an investigation
- 12 and that I was free to seek other avenues if I
- 13 chose to do so.
- 14 Q. Did she tell you that she had shared all the
- 15 documentation with Sam Currin?
- 16 A. No.
- 17 Q. Did she tell you that she had looked at all the
- 18 documentation you had sent her?
- 19 A. No, she didn't.
- 20 Q. Do you know what, if anything, she did with
- 21 regard to the documentation you sent her?
- 22 A. No, I don't.
- 23 Q. Did you have any follow-up conversations with
- 24 Teresa West?
- 25 A. Just those two phone calls -- well, the two phone

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- 1 Q. 6 and 9?
- 2 A. Uh-huh.
- 3 Q. So you took her two versions of the drug ledger?
- 4 A. And 7 is -- 7 is receipts, too?
- 5 Q. Uh-huh.
- 6 A. Well, then you can say 7 also.
- 7 Q. Any other documents that you took her?
- 8 A. I took her my tape recorder.
- 9 Q. All right. And which recordings did you share
- 10 with her?
- 11 A. I believe I only had two recordings, and that was
- 12 a recording from May 13 and a recording from May
- 13 17.
- 14 Q. Those are both with John Welford?
- 15 A. Yes.
- 16 Q. Okay. Did you leave her copies of those
- 17 recordings?
- 18 A. No. I just gave her my tape recorder, and she
- 19 said she tried to listen to it, and she couldn't
- 20 make it out. She mailed it back to me.
- 21 Q. Did you leave her copies of the documents?
- 22 A. Yes.
- 23 Q. All right. And did she interview you with regard
- 24 to your concerns?
- 25 A. She made notes.

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- 1 calls and the meeting then. And then again I
- 2 spoke to her in January of 2006, and met with her
- 3 again.
- 4 Q. You spoke to Ms. West in January of 2006. Was
- 5 that before or after your termination?
- 6 A. Before.
- 7 Q. What did you talk to her about at that time?
- 8 A. I told her I wanted to talk to her again, if I
- 9 could -- if she would be willing to see me that I
- 10 had other documentation that I thought might be
- 11 important, and I would like for her to look at
- 12 it.
- 13 Q. What other documentation were you referring to?
- 14 A. I had -- I don't -- I don't recall. I don't
- 15 recall. I had -- well, the tape recordings, I do
- 16 know that.
- 17 Q. You had additional tape recordings?
- 18 A. Yes. I had additional tape recordings. I
- 19 believe that was what it was, because I took --
- 20 she told me on the phone that she had thrown away
- 21 all the documentation that I had brought her
- 22 previously and asked me to bring it back to her
- 23 again. So I did.
- 24 Q. So in January of '06 you took back to Ms. West
- 25 all your tape recordings through that time

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- 1 period?
- 2 A. Through that time period.
- 3 Q. And you also took her, again, copies---
- 4 A. Yes.
- 5 Q. ---of the documents that we have marked as
- 6 Exhibits 6, 7, and 9?
- 7 A. 9 and 6 I know for sure. 7, yes. These are
- 8 receipts.
- 9 Q. All right. And you, again, came down to Raleigh
- 10 to meet with Ms. West?
- 11 A. Yes.
- 12 Q. And did you, again, go through the entire story
- 13 of your concerns with her?
- 14 A. Yes.
- 15 Q. Did she advise you at that time as to what she
- 16 was going to do?
- 17 A. No.
- 18 Q. At any point thereafter, did she tell you what
- 19 she was going to do with the information?
- 20 A. No.
- 21 Q. Do you know whether Ms. West followed up on the
- 22 information?
- 23 A. No, I don't. She never called me back.
- 24 Q. All right. And you said you also spoke with
- 25 Jack Carey?

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- 1 the one that had asked Frank Strickland to give
- 2 me a call back in August of 2004 to warn me that
- 3 Marrow and Jenkins and Volford were going to set
- 4 me up. So he was -- Mr. Carey didn't really
- 5 looked surprised. He looked disheartened
- 6 concerning this.
- 7 Q. And what else did you discuss?
- 8 A. My concerns, just -- just my concerns. And he
- 9 looked over the paperwork. And I asked him if
- 10 there was anything he could do to help me, and he
- 11 said that he didn't know. And that was basically
- 12 it.
- 13 Q. And when you asked Mr. Carey to help you, what
- 14 were you asking him to help you with?
- 15 A. To help me with the fact that they were falsely
- 16 accusing me of breach of confidentiality and
- 17 whatever other accusations they were making
- 18 against me, that I was not guilty of those
- 19 claims, and that they were doing this because
- 20 Volford wanted to get rid of me. And he had
- 21 recruited Marrow and Jenkins into assisting him
- 22 and had conspired to do so. So Mr. Carey was
- 23 aware. He did not say to me he was aware, but I
- 24 knew he was aware because of the phone call.
- 25 Q. So the reason you went to Mr. Carey in October of

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- 1 A. That's correct.
- 2 Q. When did you first speak with Jack Carey?
- 3 A. In October of 2004.
- 4 Q. And Mr. Carey was a City commissioner at that
- 5 point, correct?
- 6 A. That's correct.
- 7 Q. What did you ask Jack Carey to do?
- 8 A. I took copies of Exhibit 9, 6 -- now, wait a
- 9 minute. Let me be sure. (The witness reviews
- 10 documents.) The ledger sheet that is attached to
- 11 Exhibit 9, I didn't take that ledger sheet. It
- 12 was Exhibit 6 ledger sheet with the receipts. I
- 13 believe it was a copy of the receipts.
- 14 Q. So essentially Exhibits 6 and 7 then?
- 15 A. Yes. That would be correct.
- 16 Q. Did you take any recordings to Mr. Carey?
- 17 A. No.
- 18 Q. Did you record that initial conversation with
- 19 Mr. Carey?
- 20 A. No.
- 21 Q. And tell me about the conversation with
- 22 Mr. Carey.
- 23 A. I told Mr. Carey my concerns about the Chief, and
- 24 I showed him the documentation. And by this time
- 25 Mr. Carey knew what was going on, because he was

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- 1 '04 was to ask him to help you with the
- 2 disciplinary action that was going on against
- 3 you?
- 4 A. No. If he could help me at all as far as
- 5 requesting an investigation to clear the air, to
- 6 clear my name, to set things right.
- 7 Q. Do you have any idea what, if anything, Mr. Carey
- 8 did?
- 9 A. No, I don't. I don't know. I should say I don't
- 10 recall. Mr. Carey spoke out. When he retired as
- 11 commissioner he did make a comment at his
- 12 retirement that he had hoped that City officials
- 13 would do an investigation.
- 14 Q. Did Mr. Carey ever advise you that he had been
- 15 told an investigation had been done?
- 16 A. No.
- 17 Q. Any other conversations you had with Jack Carey?
- 18 A. Yes, in November 2006.
- 19 Q. And that was the conversation that's been
- 20 recorded---
- 21 A. Yes.
- 22 Q. ---and transcribed and given to us, correct?
- 23 A. Well, we didn't transcribe it. I mean, if you've
- 24 got it transcribed.
- 25 Q. I misspoke. That's the conversation that's been

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- 1 recorded and sent to us?
- 2 A. Yes, na'am.
- 3 Q. Other than your conversation with Mr. Carey in
- 4 October of '04 and the conversation in November
- 5 of '06, have there been any other conversations
- 6 with Mr. Carey?
- 7 A. I believe I did have one other conversation, but
- 8 I don't recall what it was about. And I believe
- 9 it was in '04.
- 10 Q. Was it after your initial conversation, after
- 11 your October '04 conversation?
- 12 A. Yes.
- 13 Q. Anything else you can recall about your
- 14 conversations with Jack Carey?
- 15 A. No, not at this time.
- 16 Q. And in -- I believe you testified earlier that in
- 17 November of '05, right after Thanksgiving, that's
- 18 when you decided to go to WRAL, is that correct?
- 19 A. Yes.
- 20 Q. And you also contacted Bill West?
- 21 A. Yes.
- 22 Q. And Al Wheless?
- 23 A. Yes.
- 24 Q. Do you recall whether or not you contacted WTBD?
- 25 A. I may have written a letter, but I received no

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- 1 A. (The witness reviews documents.)
- 2 Q. And I think to solve Mr. Monteith's concern, I'm
- 3 going to rephrase my question. I note as
- 4 Mr. Monteith was pointing out that Exhibit Number
- 5 18 actually is not addressed to Ms. Carlson.
- 6 It's addressed to someone by the name of
- 7 Laliberte, L---
- 8 A. Laliberte, Monica Laliberte.
- 9 Q. Monica Laliberte at WRAL?
- 10 A. Yeah.
- 11 Q. So let me ask the question another way. As you
- 12 look through here, is there anything in Exhibits
- 13 16 through 28 that does not appear to be a true
- 14 and accurate copy of correspondence between
- 15 yourself and someone at WRAL TV concerning your
- 16 desire that they run a story or do a news article
- 17 on your allegations with regard to the Chief?
- 18 A. It appears that way.
- 19 Q. It appears that they are all true and accurate
- 20 copies?
- 21 A. It appears to be.
- 22 Q. As you sit here today, Ms. Iglesias, do you have
- 23 any knowledge with respect to whether Tommy
- 24 Marrow conducted an investigation with regard to
- 25 your allegations against Chief Wolford?

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- 1 contact.
- 2 MS. DAVIS: Let's go off the record and
- 3 let me mark these exhibits real quick.
- 4 (Off the record from 4:55 to 5:07 p.m.)
- 5 (The e-mail correspondences are marked as
- 6 Deposition Exhibit Numbers 16 through 28.)
- 7 Q. (By Ms. Davis) Ms. Iglesias, I've just handed
- 8 you what I've marked as Deposition Exhibits
- 9 Number 16 through Deposition Exhibit Number 28.
- 10 I'm going to represent to you that these, at
- 11 least as far as I can tell, appear to be the full
- 12 extent of documents produced by your attorneys to
- 13 me in discovery containing correspondence, which
- 14 I presume to be between yourself -- e-mail
- 15 correspondence between yourself at an e-mail
- 16 address of royiglesias@earthlink.net to Kelcey
- 17 Carlson, who I believe is a news reporter for
- 18 WRAL TV, is that correct?
- 19 A. That's correct.
- 20 Q. If you could, take a minute to just look at
- 21 Exhibits 16 through 28 and let me know if you
- 22 believe that any of those are not accurate, true
- 23 and accurate copies of actual correspondence
- 24 exchanged between yourself and Kelcey Carlson at

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- 1 A. No.
- 2 Q. As you sit here today, do you have any knowledge
- 3 with regard to whether or not Teresa West
- 4 conducted any investigation into your allegations
- 5 against Chief Wolford?
- 6 A. I do have knowledge about that. I know that
- 7 there was no SBI investigation.
- 8 Q. Did Teresa West tell you that she did not look
- 9 into the allegations at all?
- 10 A. No. She didn't say that. She said she spoke to
- 11 Sam Currin.
- 12 Q. Did she tell you that Sam Currin did not want to
- 13 investigate?
- 14 A. She told me that he was not interested in doing
- 15 an investigation.
- 16 Q. Are you sure that she said he was not interested
- 17 in doing an investigation as opposed to him
- 18 saying he was not interested in prosecuting the
- 19 allegations?
- 20 A. I'm very sure of what I said. He is not
- 21 interested in doing an investigation.
- 22 Q. Did Teresa West tell you why Mr. Currin was not
- 23 interested in doing an investigation?
- 24 A. No.
- 25 Q. All right. Do you have any knowledge with regard

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- 1 to whether Teresa West looked at the documents
2 and listened to the recordings that you provided
3 to her?
4 A. I don't know.
5 Q. Do you have knowledge with regard to whether or
6 not Teresa West or anybody else provided the
7 district attorney, San Currin, with copies of
8 documents and/or the recordings that you gave to
9 Teresa West?
10 A. I don't know that either.
11 Q. Do you have any knowledge with regard to what, if
12 any, investigation the auditor did?
13 A. No.
14 Q. Do you have any knowledge with regard to -- and
15 by "the auditor," I mean Mr. Winston.
16 A. Correct.
17 Q. Okay. Do you have any knowledge with regard to
18 whether or not the City's internal auditor did
19 any investigation with regard to your
20 allegations?
21 A. Who is that, who is the internal auditor?
22 Q. Her name, Kelly Howard.
23 A. The finance director, Kelly Howard?
24 Q. Yes.
25 A. No.

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- 1 her about it. And I told her my concerns that he
2 was taking this money for his own personal use.
3 And she understood, and she was upset about it.
4 She didn't like it, and she said that she was
5 going to try and do something about it. And I
6 believe that Ms. Currin instigated an audit,
7 which Jim Winston came down and went through the
8 drug file. And I -- let's see, I believe he
9 actually spoke to John Wolford. Jim Winston
10 spoke with John Wolford.
11 Q. In May of 2004?
12 A. No. This was right after he took the \$400, so
13 that would be in 2003, in April 2003.
14 Q. So you believe that Jim Winston spoke with John
15 Wolford in April of 2003?
16 A. Jim Winston came to the police department, and I
17 believe that is what happened.
18 Q. In 2003, did Jim Winston talk to you?
19 A. No. There was no interview with me.
20 Q. Did he talk to you at all?
21 A. I believe he did speak to me. He greeted me.
22 And other than that, I don't recall anything.
23 Q. Did you share with Jim Winston in 2003 the
24 documents that you shared with him in 2004?
25 A. No, I didn't. I don't even know if the file --

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- 1 Q. You don't know?
2 A. I have no knowledge, and I do not know.
3 Q. Do you have any knowledge with regard to whether
4 or not Tom Burnette, the City attorney, looked at
5 any of the documentation that you provided to
6 Teresa West or conducted an investigation--
7 A. No.
8 Q. ---regarding this matter?
9 A. No. I have no knowledge of that.
10 Q. We've gone through a lot of folks today. Have
11 I -- is there anyone that you have talked to
12 about your allegations about Chief Wolford that
13 we have not discussed today?
14 A. Ms. Davis, there may be, but I just simply cannot
15 recall.
16 Q. At this time you can't recall anybody else that
17 we haven't already talked about?
18 A. At this time.
19 Q. And other than Jack Carey, have you discussed
20 your suspicions with any other commissioners?
21 A. Alice Currin.
22 Q. Okay. Tell me about your discussions with Alice
23 Currin.
24 A. When Chief Wolford -- I believe it was when he
25 took the \$400, I called Ms. Currin, and I told

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- 1 if he took the file. I feel like he had to take
2 the file, but I didn't share documents with him.
3 I didn't share any concerns with him at that
4 time.
5 Q. Why didn't you share the concerns with him in
6 2003?
7 A. I knew as soon as I shared concerns that there
8 was going to be retaliation. I expected that.
9 Q. But at that point you had shared those concerns
10 with Alice Currin?
11 A. Yes.
12 Q. All right. Are there any other commissioners
13 that you spoke with?
14 A. No.
15 Q. Other than Jim Carey and Alice Currin?
16 A. No.
17 Q. Any other employees that you spoke with other
18 than the ones that you have listed for me today?
19 A. I don't recall any other at this time.
20 Q. And any other discussions with persons outside
21 the department other than the ones that you have
22 described to me today?
23 A. Other than my husband, my immediate family, no.
24 Q. Your husband. And by immediate family, do you
25 mean your daughter?

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- 1 A. My son.
 2 Q. Your son. Have you shared this information with
 3 your daughter?
 4 A. Yes. She's aware of it.
 5 Q. How about any of your grandchildren?
 6 A. No. No.
 7 Q. Parents, in-laws?
 8 A. No -- my mother. Now, my mother knows, yeah. My
 9 mother knows, and my two brothers.
 10 Q. Your two brothers?
 11 A. Uh-huh.
 12 Q. Do they all live in Oxford?
 13 A. No. My mother lives in Angier, and my two
 14 brothers also live in Angier.
 15 Q. Anyone else in your family?
 16 A. No.
 17 Q. How about anyone at your church?
 18 A. No.
 19 Q. No pastor?
 20 A. No. Recently -- I most recently told -- told
 21 them of concerns and that I had hired attorneys,
 22 you know, to help me.
 23 Q. You told your pastors?
 24 A. No, my Sunday school class.
 25 Q. You told your Sunday school class?

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- 1 Training and Standards?
 2 A. No.
 3 Q. Do you have any knowledge with regard to whether
 4 or not Training and Standards conducted any
 5 investigation with regard to this matter?
 6 A. No.
 7 Q. Do you have any recollection of talking with Eric
 8 Evanson or anyone with the U.S. Attorneys Office
 9 regarding this matter?
 10 A. No.
 11 Q. Do you have any knowledge with regard to whether
 12 or not the U.S. Attorneys Office or anyone with
 13 the U.S. Attorneys Office conducted any
 14 investigation with regard to this matter?
 15 A. No.
 16 MS. DAVIS: I think we're on Exhibit
 17 Number 29, is that correct?
 18 COURT REPORTER: Yes.
 19 (The WRAL transcript is marked as Deposition
 20 Exhibit Number 29.)
 21 Q. Ms. Iglesias, I'm going to show you what we've
 22 marked as Exhibit Number 29, and I'm going to
 23 represent to you that Exhibit Number 29 is a
 24 transcript that we had made here in our office of
 25 the WRAL article, for lack of a better word, the

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- 1 A. Yes. They were asking, "Are there any prayer
 2 requests?" And I asked for prayer.
 3 Q. When you told your Sunday school class, did you
 4 share with them the nature of your concerns?
 5 A. I told them basically that I had made a discovery
 6 that the Chief had removed funds, and I had hired
 7 attorneys, and I was going through the legal
 8 process, and I needed prayer.
 9 Q. And where do you attend church?
 10 A. I attend church at Living Stones Church of God.
 11 Q. Is that in Oxford?
 12 A. Yes, out in the County.
 13 Q. In Granville County?
 14 A. Uh-huh.
 15 Q. And how many people are in your Sunday school
 16 class?
 17 A. There's five.
 18 Q. Anyone else that you've shared your concerns
 19 with?
 20 A. Not that I can recall.
 21 Q. Do you have any recollection of talking with
 22 Scott Perry or anyone with Training and Standards
 23 regarding your concerns?
 24 A. No.
 25 Q. You never received any contact at all from

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- 1 WRAL piece from January of 2006. I would ask you
 2 to take a quick look at that, if you would.
 3 A. (The witness complies with request.)
 4 Q. And just tell me, based on your first glance,
 5 does that appear to be a fairly accurate
 6 transcription of the WRAL piece that was run in
 7 January of '06?
 8 A. (The witness reviews document.)
 9 Q. Do you want us to go off the record so you can
 10 read that?
 11 A. This seems to be a close -- you know, as close as
 12 I know.
 13 Q. Okay. That's fine. I'm going to show you what
 14 I've marked as Exhibit Number 30.
 15 (The packing slip with notes is marked as
 16 Deposition Exhibit Number 30.)
 17 A. (The witness reviews document.)
 18 Q. If you could, could you just tell me what Exhibit
 19 Number 30 is?
 20 A. It's a packing slip for some Christian books that
 21 I ordered, and I made some notes on it.
 22 Q. The notes you're referring to are actually at the
 23 bottom of Exhibit 30, but you have to turn
 24 Exhibit 30 upside down to read the notes?
 25 A. Yeah.

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- 1 Q. Is that what you're referring to?
- 2 A. Yes.
- 3 Q. And if you could, translate for me what the
- 4 meaning of those notes is with regard to this
- 5 case.
- 6 A. It says, "Minutes for open request for
- 7 investigation." And then it's got, "July,
- 8 August, September, October, and December 2005."
- 9 This is where I believe that they went -- private
- 10 session--- I don't know what you call it. The
- 11 commissioners, I'm talking about.
- 12 Q. Went into closed session?
- 13 A. ---closed session at a commissioners meeting.
- 14 And the reason I wrote, "July, August, September,
- 15 October," I did not remember when that occurred.
- 16 They went into closed session and discussed
- 17 whether or not to conduct an investigation into
- 18 my concerns of Welford taking money from the drug
- 19 fund. I believe that's what that is.
- 20 Q. And so it's your understanding that the
- 21 commissioners went into closed session sometime
- 22 between July and December of 2005 to decide
- 23 whether or not to conduct an investigation into
- 24 your allegations?
- 25 A. I believe that, yes.

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- 1 Q. All right. Who advised you that the
- 2 commissioners had taken this action in closed
- 3 session, or discussed this matter in closed
- 4 session?
- 5 A. I believe it was Frank Strickland. I am not
- 6 sure. It was either Mr. Carey or Mr. Strickland.
- 7 Q. I'm going to run through the next documents
- 8 rather quickly, if we can. I'm going to show you
- 9 what we're marking as Exhibit Number 31.
- 10 (The Written Warning dated 11/6/01 is marked
- 11 as Deposition Exhibit Number 31.)
- 12 Q. Just take a quick look at that and tell me if you
- 13 recall having received this memorandum for
- 14 November the 6th, 2001, from Chief Welford
- 15 entitled "Written Warning."
- 16 A. No. No. This -- I have never received this from
- 17 John Welford.
- 18 Q. So you don't recall having received this warning
- 19 at all?
- 20 A. No.
- 21 Q. All right, okay. If you look at the second
- 22 paragraph, the second sentence, it states, "You
- 23 also told her in related terms that, quote, 'my
- 24 days were numbered,' end quote, or, 'my day is
- 25 coming,' quote, something in that related type of

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- 1 language." Earlier in the day you were talking
- 2 about a discussion you had with Ms. Pleasants---
- 3 A. Ms. Davis, this is a fabricated document. This
- 4 is fictitious. He -- he made this up. This
- 5 never happened. I never saw this. I never
- 6 received this. I remember this being presented
- 7 at my grievance hearing with the City after I had
- 8 been terminated, but that's what this is. I'm
- 9 sorry I interrupted you. Please continue.
- 10 Q. So we're clear, your testimony is that you have
- 11 never before received Exhibit Number 31 and that
- 12 you did not receive this written warning, is that
- 13 correct?
- 14 A. That is correct.
- 15 Q. All right. And we were talking about the second
- 16 sentence of the second paragraph where it
- 17 references a discussion with Mamie Pleasants
- 18 where you're alleged to have said something along
- 19 the lines of my days were numbered or my day is
- 20 coming, presumably about Chief Welford. Earlier
- 21 in the day today we were having a discussion
- 22 about an allegation that you had made that sort
- 23 of a statement to Mamie Pleasants. Do you recall
- 24 that?
- 25 A. I made the statement not directly to her, but I

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- 1 made the statement. Mr. Woodlief was in there as
- 2 well. Mr. Woodlief had read the article, and I
- 3 said, "Well, it sounds like Strickland has got
- 4 Welford's days numbered."
- 5 Q. And was that statement made around the November
- 6 2001 time frame, as best you recall?
- 7 A. No, I don't. I don't -- you know, I cannot
- 8 verify a date.
- 9 Q. Moving on to what we're going to mark as Exhibit
- 10 Number 32, can you take a look at Exhibit Number
- 11 32 and tell me whether you recall having ever
- 12 received that warning?
- 13 (The memo dated 10/23/01 is marked as
- 14 Deposition Exhibit Number 32.)
- 15 A. (The witness reviews document.) This is not a
- 16 warning.
- 17 Q. Do you recall ever having received a copy of what
- 18 we've marked as Exhibit Number 32?
- 19 A. Oh, yes.
- 20 Q. You, along with several people, received a copy
- 21 of what we've marked as Exhibit Number 32, is
- 22 that correct?
- 23 A. Yes, along with Captain Williamson and Lieutenant
- 24 Charles Crudup.
- 25 Q. And the subject of Exhibit Number 32 is the

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1 importance of reporting concerns through the
2 chain of command, is it not?
3 A. I don't know. Can I read it?
4 Q. Absolutely.
5 A. (The witness reviews document.) Okay. Your
6 question again, please?
7 Q. My question was with regard to the topic of the
8 memo that's Exhibit Number 32. The topic is the
9 importance of confidentiality and proceeding with
10 complaints through the chain of command within
11 the City, is it not?
12 A. It is, correct.
13 Q. Moving on to what we're going to mark -- what
14 we've marked as Exhibit Number 33. Would you
15 take a look at Exhibit Number 33 and let me know
16 if you've seen that document before?
17 (The memo dated 5/17/04 is marked as
18 Deposition Exhibit Number 33.)
19 A. (The witness reviews document.) Yes.
20 Q. And you do not deny having received that written
21 warning, do you?
22 A. No.
23 Q. I'm going to show you what we've marked as
24 Exhibit Number 34. If you would, take a look at
25 that document.

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1 I am at this point requesting that you not memo
2 this perceived, quote, 'breach of
3 confidentiality' to my employee file based on the
4 grounds that I was unaware of your internal
5 investigation and the sensitivity of it, and in
6 fact, was only doing my job. If you had confided
7 in me, had a little faith in me, this problem
8 would never have developed." Do you see what I'm
9 referring to?
10 A. Yes.
11 Q. And as of the author -- as of the writing of this
12 letter Chief Wolford had explained to you that
13 the reason he was taking money out of the drug
14 fund was because he was conducting an internal
15 investigation, is that correct?
16 A. He said he was doing his own private
17 investigation into crime -- into corruption
18 within the police department.
19 Q. Well, you refer to it in the first line I read as
20 an internal corruption investigation?
21 A. Okay.
22 Q. All right?
23 A. Uh-huh.
24 Q. And at that point, did you believe that Chief
25 Wolford had in fact conducted an investigation?

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1 (The letter dated 5/17/04 is marked as
2 Deposition Exhibit Number 34.)
3 A. (The witness reviews document.)
4 Q. Exhibit Number 34, for the record, is a three-
5 page document dated Monday, May 17th, 2004. And
6 on the last page it appears to be authored by
7 Sharon B. Iglesias. Ms. Iglesias, let me know
8 when you've had a chance to review that, please.
9 A. Yes, this is it.
10 Q. This is, in fact, a true and accurate copy of a
11 letter you authored to Chief Wolford in response
12 to the written warning that we just identified as
13 Exhibit Number 33, is it not?
14 A. It appears to be -- Exhibit Number 34.
15 Q. Right. If you look at the fifth line up in the
16 first paragraph, the line starts with the word
17 "Funds," but I would like you to start with the
18 first full sentence of that line which starts,
19 "If you had trusted me enough." Do you see what
20 I'm referring to?
21 A. Uh-huh.
22 Q. I'm going to read that into the record. It says,
23 "If you had trusted me enough to explain the
24 internal corruption investigation I would have
25 actively assisted you in every way possible. So

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1 A. No.
2 Q. But you wrote this letter anyway?
3 A. Yes, I did.
4 Q. Ms. Iglesias, I'm going to show you what we're
5 marking as Exhibit Number 35, which is a one-page
6 document that says it's to Tommy Marrow from
7 Sharon B. Iglesias, dated May the 18th, 2004.
8 And it's titled regarding -- or reference,
9 "Notice of Appeal to Disciplinary Action." And
10 it appears to be signed by you, is that correct?
11 (The letter dated 5/18/04 is marked as
12 Deposition Exhibit Number 35.)
13 A. That's correct.
14 Q. And this is an appeal of the disciplinary action
15 imposed upon you by Chief Wolford as reflected in
16 what we've marked as Deposition Exhibit Number
17 33, is that correct?
18 A. Yes. Say that again, 337
19 Q. Yes---
20 A. Did you say Exhibit 337
21 Q. Exhibit Number 35 is an appeal of the
22 disciplinary action that is reflected in the
23 memo, which we have previously marked as Exhibit
24 Number 337
25 A. Oh.

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- 1 Q. Is that correct?
- 2 A. Okay. (The witness reviews document.) Oh, yes.
- 3 Okay. Yes, I see what you're saying.
- 4 Q. I'm going to show you what we're marking as
- 5 Deposition Exhibit Number 36, which appears to be
- 6 a memo to Sharon Iglesias dated May the 25th,
- 7 2004 from Tommy Marrow responding to your memo
- 8 dated May the 18th, 2004, which we have
- 9 previously marked as Exhibit Number 35?
- 10 (The memo dated 5/25/04 is marked as
- 11 Deposition Exhibit Number 36.)
- 12 A. That's correct.
- 13 Q. And on the bottom of this there's a note that
- 14 appears to be in your handwriting, is that
- 15 correct?
- 16 A. That's correct.
- 17 Q. Would you read that note into the record for me?
- 18 A. "I was following procedure."
- 19 Q. Mr. Marrow said in Exhibit 36 that he was
- 20 encouraging you to follow the appropriate
- 21 procedure to appeal, is that correct?
- 22 A. That's correct.
- 23 Q. And it's your contention, I gather from this
- 24 note, that you were, in fact, following the
- 25 proper procedure by appealing directly to

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- 1 and Adverse Action Appeal Procedure for
- 2 Discrimination," is that the section of the
- 3 personnel policy that you're referring to that
- 4 allows direct appeal to the human resources
- 5 director or the city manager?
- 6 A. Yes. Yes, it is.
- 7 Q. Is it your contention, then, that the
- 8 disciplinary action that was taken against you in
- 9 May of 2004 was on the basis of discrimination?
- 10 A. I don't know that it was on the basis of
- 11 discrimination. It says, "Grievance and Adverse
- 12 Action Appeal Procedure for Discrimination." I
- 13 just took it as grievance.
- 14 Q. Okay. So you understood the policy to be saying
- 15 that regardless of the type of grievance you were
- 16 proceeding with, you had the right to appeal
- 17 directly to HR or the city manager?
- 18 A. That's correct.
- 19 Q. And you did not understand that in cases other
- 20 than discrimination you should proceed through
- 21 the five-step procedure outlined in Section 4 of
- 22 the policy, which starts at page 59, also
- 23 numbered 321, which is the third page in of
- 24 Exhibit 37?
- 25 A. Please repeat your question.

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- 1 Mr. Marrow?
- 2 A. That is correct.
- 3 Q. Is it your understanding that the City of
- 4 Oxford's personnel policy allows direct appeals
- 5 to the City manager in the case of all
- 6 grievances?
- 7 A. That's what the policy implied. It said you
- 8 could appeal to either the human resources
- 9 manager or the City manager directly.
- 10 Q. I'm going to show you what we're marking as
- 11 Exhibit Number 37.
- 12 (The personnel policy excerpt is marked as
- 13 Deposition Exhibit Number 37.)
- 14 A. (The witness reviews document.)
- 15 Q. For the record, Exhibit Number 37 is a five-page
- 16 document, which I will represent is an excerpt of
- 17 the City of Oxford's personnel policies, which
- 18 were actually produced by you, Ms. Iglesias, in
- 19 discovery as your discovery documents numbered
- 20 319 through 323?
- 21 A. Yes.
- 22 Q. And I'm going to refer you to page -- it's the
- 23 next to the last page of the exhibit. It's page
- 24 numbered 322. It's also numbered 60. Section 6,
- 25 the grievance -- the section titled, "Grievance

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- 1 Q. Okay. Actually, let me just strike that
- 2 question.
- 3 Is it your contention that the disciplinary
- 4 action that was taken against you in 2004 by
- 5 Chief Wolford was because of either your race,
- 6 your gender, that is your sex, or because of some
- 7 other protected characteristic that you have?
- 8 A. That it was?
- 9 Q. Yes.
- 10 A. That's what was stated in my appeal to Tommy
- 11 Marrow when I was terminated, I believe.
- 12 Q. So you believe that Chief Wolford -- the
- 13 disciplinary action taken against you in 2004 was
- 14 on the basis of what, your gender?
- 15 A. No. I don't believe it was based solely on my
- 16 gender.
- 17 Q. Do you believe it was based in part on your
- 18 gender?
- 19 A. I don't know. We've been through this. I
- 20 believe that it's possible.
- 21 Q. Okay. Ms. Iglesias, I'm going to show you what
- 22 we're marking as Deposition Exhibit Number 38.
- 23 Do you recall having received this warning?
- 24 (The final warning is marked as Deposition
- 25 Exhibit Number 38.)

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- 1 A. (The witness reviews document.) Yes.
2 Q. You have already testified that despite what this
3 warning says you do not believe that the real
4 reason for the issuance of the warning was
5 because of a breach of confidentiality, is that
6 correct?
7 A. That is correct.
8 Q. Ms. Iglesias, I'm going to show you what we've
9 marked as Exhibit Number 39. Does that appear to
10 be a true and accurate copy of your notice of
11 appeal to Tommy Marrow and Don Jenkins with
12 regard to the disciplinary action?
13 (The notice of appeal is marked as
14 Deposition Exhibit Number 39.)
15 A. (The witness reviews document.) Yes, it does.
16 Q. Which we've marked as Exhibit Number 38?
17 A. Yes.
18 Q. Ms. Iglesias, I'm going to show you what's marked
19 as Exhibit Number 39. This appears, for the
20 record---
21 MR. MONTEITH: Number 40.
22 MS. DAVIS: 40, I'm sorry.
23 MR. MONTEITH: Go ahead. No, you're
24 right -- well?
25 COURT REPORTER: That's 39.

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- 1 MS. DAVIS: Why don't we mark that.
2 Thank you.
3 Q. Okay, Ms. Iglesias, I'm going to show you what we
4 have now remarked as Exhibit Number 40, which,
5 for the record, appears to be a two-page document
6 dated October the 6th, 2004 addressed to Tommy
7 Marrow and written by you, is that correct?
8 (The memo to Tommy Marrow is marked as
9 Deposition Exhibit Number 40.)
10 A. (The witness reviews document.) That's correct.
11 Q. And that was a statement that was submitted by
12 you in advance -- I'm sorry. After you had a
13 grievance hearing with Don Jenkins, is that
14 correct?
15 A. That's correct.
16 Q. All right. Ms. Iglesias, I'm going to show you
17 what I've marked as Deposition Exhibit Number 41,
18 which, for the record, is a one-page document
19 addressed to Sharon Iglesias from Don Jenkins
20 indicating that after considering the information
21 presented to you at the grievance hearing and the
22 letter, which we have previously marked as
23 Exhibit Number 40 that Mr. Jenkins sees no reason
24 to overturn his original decision, is that
25 correct?

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- 1 (The Memo to Ms. Iglesias is marked as
2 Deposition Exhibit Number 41.)
3 A. (The witness reviews document.) That's correct.
4 Q. Do you recall receiving this document?
5 A. Yes.
6 Q. All right. I'm going to show you what we're
7 marking as Deposition Exhibit Number 42, which
8 appears to be a one-page letter dated October the
9 8th, 2004, to Sharon Iglesias from Tommy Marrow.
10 Do you recall having received that document?
11 (The letter to Ms. Iglesias is marked as
12 Deposition Exhibit Number 42.)
13 A. Yes.
14 Q. And did Mr. Marrow, in fact, put you on paid
15 administrative leave through -- I'm sorry.
16 Starting October the 8th through the date of your
17 grievance/name clearing hearing?
18 A. I would have to say I don't know that this is the
19 exact date, but it was around this time. It was
20 around this time.
21 Q. In any event, in October of 2004 you didn't lose
22 any days that were unpaid, did you?
23 A. No. No.
24 Q. All of your leave was paid leave?
25 A. Yes.

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- 1 Q. I'll show you what we're marking as Exhibit 43,
2 which, for the record, is a two-page document
3 which is entitled, "Supplement to Grievance/Name
4 Clearing Hearing held Thursday, October 14th,
5 2004," and it appears to be authored by Sharon
6 Iglesias?
7 (The Supplement to Grievance/Name Clearing
8 Hearing is marked as Deposition Exhibit
9 Number 43.)
10 A. That's correct.
11 Q. And you do recall preparing and submitting this
12 document to Mr. Marrow?
13 A. Yes.
14 Q. I'll direct you to the bottom of the first page
15 of Exhibit 43. There's a note on there that
16 appears to be in your handwriting. It says -- I
17 believe it says, "You did this to me?"
18 A. Uh-huh.
19 Q. Can you tell me what that means?
20 A. It means that Welford set me up.
21 Q. It means that you believed at that time that
22 Welford set you up?
23 A. Yes.
24 Q. Let me show you what we're marking as Exhibit
25 Number 44, which, for the record, is a two-page

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- 1 document dated October the 22nd, 2004, addressed
2 to Sharon B. Iglesias from Thomas Marrow, City
3 manager, which is a determination or appears to
4 be a determination of Mr. Marrow of the
5 grievance/name clearing hearing that was
6 conducted in October of '04, is that correct?
7 (The letter dated 10/22/04 is marked as
8 Deposition Exhibit Number 44.)
9 A. That's correct.
10 Q. And in this memo Mr. Marrow reinstates you, is
11 that correct?
12 A. And gives me a final warning.
13 Q. And the subject of that final warning is once
14 again the confidentiality, correct?
15 A. Yes.
16 Q. And you do recall receiving this document?
17 A. Yes.
18 Q. Ms. Iglesias, I'm going to show you what we're
19 marking as Exhibit Number 45, which, for the
20 record, appears to be a three-page document
21 addressed to Tommy Marrow from Sharon Iglesias?
22 (The letter to Mr. Marrow is marked as
23 Deposition Exhibit Number 45.)
24 A. Uh-huh.
25 Q. Requesting essentially two things, payment of

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- 1 A. Yes, that's correct.
2 Q. And at the very top of the page it says, "CD
3 Track 14." What does that refer to?
4 A. A tape recording.
5 Q. A tape recording of your conversation with
6 Mr. Marrow?
7 A. Yes.
8 Q. During the conversation with Mr. Marrow on May
9 the 23rd, 2005, do you recall Mr. Marrow asking
10 you if you were recording the conversation?
11 A. Yes.
12 Q. Do you recall telling him---
13 A. No.
14 Q. ---that you were not recording the conversation?
15 A. That's correct.
16 Q. And you were, in fact, recording the
17 conversation?
18 A. Yes.
19 Q. So you lied to Mr. Marrow?
20 A. Yes.
21 Q. And the notes at the bottom of the page say,
22 "Mr. Marrow ignored my request and at the end of
23 30 days I received no response from him,
24 nothing"?
25 A. That's correct.

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- 1 attorneys fees---
2 A. Yes.
3 Q. ---and clearing of your file of all letters and
4 memos of accusations, is that correct?
5 A. False accusations, yes.
6 Q. All right. And looking at Exhibit Number 45,
7 there are two documents attached to the back of
8 it numbered 549 and 550. Can you tell me what
9 those documents are?
10 A. This is an employee performance appraisal that's
11 dated February the 3rd, 2005, that was done by
12 Captain Bob Williamson.
13 Q. And was that personnel appraisal attached to your
14 letter to Mr. Marrow when you gave it to
15 Mr. Marrow?
16 A. No. I didn't give this letter to Mr. Marrow.
17 This letter was not sent to Tommy Marrow. I went
18 to see him in person.
19 Q. Excuse me. You're exactly right. So let's talk
20 about the notes that are on Exhibit Number 45.
21 In the upper right-hand corner you have a
22 notation that says, "This letter was not sent to
23 T. Marrow. I went to see him in person on May
24 the 23rd, '05 and said to him personally what's
25 in this letter," is that correct?

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- 1 Q. And you also have a note, "Mr. Marrow wanted to
2 know if I had a tape recorder on"?
3 A. Yes.
4 Q. Do you recall during your conversation on May the
5 23rd, 2005, asking Mr. Marrow for a raise?
6 A. Yes.
7 Q. Do you recall telling Mr. Marrow that you just
8 received a good performance review from Captain
9 Williamson?
10 A. No.
11 MS. DAVIS: We'll take a quick break
12 and mark the rest of these, and then we
13 should be able to push through.
14 (A recess is taken from 5:56 to 6:10. p.m.)
15 (The letters dated 7/11, 7/18, and 8/4/05
16 are marked as Deposition Exhibit Numbers
17 46, 47, and 48.)
18 Q. (By Ms. Davis) I'm going to ask you to take a
19 look at Exhibits Number 46, 47, and 48. Do you
20 have any reason to dispute the authenticity of
21 any of those three documents?
22 A. No.
23 Q. All right. Looking at Exhibit Number 49, that
24 appears to be an e-mail from you to the entire
25 department?

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- 1 (The e-mail 8/23/05 is identified as
2 Deposition Exhibit Number 49.)
3 A. Uh-huh.
4 Q. I assume that means to the entire Oxford Police
5 Department?
6 A. Yes.
7 Q. And that's in response to, I guess, a want ad
8 that was placed in your box?
9 A. Yes, that's correct.
10 Q. And you do recall sending that e-mail to the
11 entire department?
12 A. Yes.
13 Q. I'm going to show you -- have you take a look at
14 what's been marked as Exhibit Number 50.
15 (The memo dated 1/20/06 is identified as
16 Deposition Exhibit Number 50.)
17 A. (The witness reviews document.)
18 Q. Do you recall sending the e-mail that's
19 attached--- Excuse me. ---that's marked as
20 Exhibit Number 50 to Glen Boyd in response to the
21 e-mail that's on the second page of Exhibit 50
22 from Glen Boyd?
23 A. I sent it to Glen Boyd and Captain Williamson,
24 Tommy Marrow, yes.
25 Q. And this appears to be a true and accurate copy

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- 1 (Ms. Iglesias's notes are identified as
2 Deposition Exhibit Numbers 52, 53, and 54.)
3 A. (The witness reviews documents.)
4 Q. And do you want to take some time to read those?
5 A. No. They appear to be---
6 Q. Do number -- documents Number 52, 53, and 54
7 appear to be true and accurate copies of
8 documents that you authored?
9 A. They appear to be.
10 Q. Referring to Exhibit Number 52, for what purpose
11 did you create that document?
12 A. 52?
13 Q. Yes, ma'am.
14 A. These were notes for myself, and it stated --
15 well, it says, "Notes for myself for grievance
16 process meetings." These are notes that I made.
17 Q. Notes that you prepared in preparation for the
18 grievance hearing before Don Jenkins?
19 A. I think so, yes.
20 Q. And looking at Exhibit Number 53, for what
21 purpose did you prepare that document?
22 A. This was prepared in response to Tommy Marrow not
23 meeting with me. He sent me a letter stating
24 that he was not going to meet with me and
25 suggested -- that's where he suggested he wanted

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- 1 of the memo that you sent?
2 A. It appears to be.
3 Q. Looking at Exhibit Number 51.
4 (The termination memo is identified as
5 Deposition Exhibit Number 51.)
6 A. (The witness reviews document.)
7 Q. It appears to be a termination memo dated January
8 the 24th, 2006, signed by John Wolford but
9 unsigned by anybody else?
10 A. Correct.
11 Q. Do you recall receiving a copy of this memo?
12 A. Yes.
13 Q. Is there a reason that you elected not to sign
14 the memo?
15 A. Yes.
16 Q. Why is that?
17 A. I didn't agree with it.
18 Q. You didn't agree with the content of the memo?
19 A. Yes.
20 Q. But you don't dispute that you received the memo?
21 A. Correct.
22 Q. All right. I'm going to ask you to, again, take
23 a look at a group of documents, which are
24 Exhibits 52, 53, and 54. Just take a look at
25 those, please.

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- 1 me to go through Don Jenkins.
2 Q. And you elected not to send this letter, if I
3 understand your notes at the top?
4 A. Yes.
5 Q. And you did not pursue an appeal with Don Jenkins
6 in May of 2004 either, did you?
7 A. That's correct. Not at that time I didn't, no.
8 Q. Looking at Exhibit Number 54, for what purpose
9 did you create that document?
10 A. I believe this was created for -- there's no
11 date, but it looks like the document I created
12 for the Employment Security Commission.
13 Q. You created this for the purpose of preparing
14 yourself for the Employment Security Commission
15 hearing---
16 A. No.
17 Q. ---or you created this for submission to the
18 Employment Security Commission?
19 A. To submit when I made my initial claim.
20 Q. Did you, in fact, submit this---
21 A. Yes.
22 Q. ---or do you recall? Okay.
23 A. I believe I did, yes.
24 Q. All right. And then I'm going to ask you, if you
25 would, to look at -- just take a quick look at

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- 1 Exhibit Numbers 55 and 56, which I'll represent
2 to you are the amended complaint and -- which has
3 been filed by your attorneys on your behalf. And
4 also Plaintiff's responses, your responses, to
5 interrogatories and request for production of
6 documents that were sent to you by the defendants
7 in this case.
8 (The Amended Complaint and Plaintiff's
9 Responses are identified as Deposition
10 Exhibit Numbers 55 and 56.)
11 A. (The witness reviews document.)
12 Q. I assume that you've had an opportunity to review
13 both of those documents prior to today?
14 A. Yes.
15 Q. And you've had an opportunity to read the --
16 let's start first with Exhibit Number 55, the
17 Amended Complaint, which was filed on your
18 behalf?
19 A. Yes.
20 Q. Prior to it being filed---
21 A. I'm sorry?
22 Q. Have you had an opportunity to review Exhibit 55
23 prior to it being filed with the court?
24 A. Yes.
25 Q. And can you affirm to me that as we sit here

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- 1 under oath that the contents of the Amended
2 Complaint were true and correct to the best of
3 your knowledge?
4 A. Yes.
5 Q. Moving on to Exhibit 56, which I'll represent to
6 you are the discovery responses sent from your
7 counsel to us. I assume you've had an
8 opportunity to review these prior to them being
9 forwarded to us?
10 A. Correct.
11 Q. And you had an opportunity to check and make sure
12 that all the information contained in there is
13 correct?
14 A. That is correct.
15 Q. As you sit here today, are you aware of any
16 corrections, amendments, or changes that need to
17 be made to these responses to discovery?
18 A. Not to my knowledge. Not at this time, no.
19 Q. And can you affirm for me as we sit here under
20 oath that these statements contained in the
21 responses to discovery are true and correct to
22 the best of your knowledge, information, and
23 belief?
24 A. To the best of my knowledge they are.
25 Q. I'm going to ask you to quickly take a look at

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- 1 page 2 of Exhibit Number 56.
2 A. (The witness complies with request.)
3 Q. Interrogatory Number 2 and specifically your
4 answer to interrogatory number 2 -- if you'll go
5 through the answer to interrogatory number 2, it
6 starts on page 2 and continues on through pages
7 3, 4, 5, and the top of page 6.
8 A. (The witness reviews document.)
9 Q. As you sit here today, are you aware of any other
10 written statements by any witness or potential
11 witness to this action that were not included in
12 the list that is in response to question number 2
13 of Exhibit Number 56?
14 A. To the best of my knowledge this would -- this
15 would be correct.
16 Q. And are you aware of any other recordings that
17 are not contained on the list in response to
18 question number 2 of Exhibit Number 56?
19 A. No.
20 Q. Since the date of your responses, July the 22nd,
21 2008, have you recorded any additional
22 conversations with anyone that have not yet been
23 produced?
24 A. No. Excuse me.
25 Q. Do you need some more water?

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- 1 A. I've got some.
2 Q. All right. Now, I'm going to ask you to refer
3 over, if you would, to question number 9, which
4 is on page 11 of Exhibit Number 56.
5 A. (The witness complies with request.)
6 Q. It's at the bottom of page 11.
7 A. Okay.
8 Q. And I'm referring -- I'm going to ask you a
9 couple of questions about the last two sentences
10 on page 11, starting with, "Plaintiff further
11 responds that she has sustained damages for pain
12 and suffering." Do you see what I'm referring
13 to?
14 A. Uh-huh.
15 Q. All right. And it says, "This amount is based on
16 the mental anguish and other harm caused to
17 Plaintiff as result of her discharge from
18 employment with the City of Oxford and conduct of
19 Defendants surrounding the same to include damage
20 to Plaintiff's reputation?"
21 A. Yes.
22 Q. Can you tell me what type of pain, suffering, and
23 mental anguish you have endured?
24 A. The loss of my job, the loss of income, the loss
25 of benefits, immediately after it would be the

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- 1 loss of confidence and self-esteem. The loss
- 2 created financial worries and problems. The loss
- 3 created physical problems. I suffered
- 4 psychologically, psychological trauma. Physical
- 5 problems such as high blood pressure, increased
- 6 levels, blood sugar levels, I suffered symptoms
- 7 of posttraumatic stress disorder. I had -- oh.
- 8 I had nightmares. I had at different times,
- 9 according to the stress, bouts of vomiting,
- 10 stomach ulcers, intestinal problems, muscle aches
- 11 and pains. The stress was -- the stress was so
- 12 severe that it created muscle problems in my
- 13 neck, and actually my jaw became dislocated
- 14 because of it. The muscles became so tight that
- 15 I dislocated my jaw. Marital problems, that's
- 16 all I can think of right now.
- 17 Q. And all of this was as a result of your
- 18 termination of employment?
- 19 A. Yes.
- 20 Q. Have you seen any healthcare providers with
- 21 regard to any of these illnesses, injuries, or
- 22 symptoms?
- 23 A. No.
- 24 Q. No healthcare providers at all?
- 25 A. Just the annual checkup, and that's how I

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- 1 A. On the phone.
- 2 Q. Has he treated you for any of these conditions?
- 3 A. No.
- 4 Q. Has he rendered a medical opinion with regard to
- 5 causation -- the cause of any of these---
- 6 A. Yes, he did.
- 7 Q. He rendered a medical opinion?
- 8 A. Yes, he did.
- 9 Q. To you, orally?
- 10 A. Yes.
- 11 Q. What's your brother-in-law's name?
- 12 A. His name is Antonio Rea, R-E-A.
- 13 Q. And where does he practice?
- 14 A. In Mexico. I do not know the name of the town.
- 15 Q. Is he licensed to practice in the United States?
- 16 A. No.
- 17 Q. And the only opinion he rendered was an oral
- 18 opinion to you?
- 19 A. Yes.
- 20 Q. Based on your description to him over the phone?
- 21 A. Yes.
- 22 Q. Have you ever met your brother-in-law in person?
- 23 A. No.
- 24 MS. DAVIS: If you'll give me a minute,
- 25 I think I -- that's about all the questions

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- 1 discovered the high blood pressure.
- 2 Q. Did your physician indicate that the high blood
- 3 pressure was as a result of the termination?
- 4 A. No. I did not relate to my physician certain
- 5 things. She knew I had problems, you know, on my
- 6 job -- well, pertaining to the job, of my
- 7 termination, and -- but we didn't go into it.
- 8 Q. Have you seen any mental healthcare practitioners
- 9 as a result of the mental health issues that
- 10 you've described?
- 11 A. No.
- 12 Q. Do you have any diagnosis of any mental disorder,
- 13 including a PTSD or any other such problems?
- 14 A. The only person I spoke to was my brother-in-law.
- 15 He is a doctor, and I related my symptoms to him.
- 16 And he told me what he thought.
- 17 Q. He is a medical doctor, or he's a---
- 18 A. He's a regular MD.
- 19 Q. What's his practice area?
- 20 A. Just general.
- 21 Q. A general practitioner?
- 22 A. General practitioner.
- 23 Q. Did you actually see him in the office?
- 24 A. No. No.
- 25 Q. Did you speak to him just on the phone?

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- 1 I have.
- 2 (A recess is taken from 6:25 to 6:30 p.m.)
- 3 Q. (By Ms. Davis) Ms. Iglesias, earlier in the
- 4 day -- I'm going to ask you to think back. You
- 5 listed Tommy Marrow, Don Jenkins, Chief Wolford,
- 6 and Patricia Ford as folks who you believed had
- 7 participated in the conspiracy to set you up to
- 8 be terminated. Is there anybody else other than
- 9 Pat Ford, Tommy Marrow, Don Jenkins, and Chief
- 10 Wolford that you believe has participated in that
- 11 conspiracy?
- 12 A. Yes, ma'am.
- 13 Q. Who else?
- 14 A. Glen Boyd, Lieutenant Glen Boyd.
- 15 Q. And the conduct that you're referring to, his
- 16 participation, is it anything other than the
- 17 conduct that you have already described to me in
- 18 your deposition today?
- 19 A. It would be pertaining to the last set of
- 20 exhibits pertaining to his e-mail to me where I
- 21 responded back to him. Let me see if I can find
- 22 that.
- 23 Q. I believe it will be Exhibit Number 54.
- 24 A. 54. (The witness reviews document.)
- 25 Q. Excuse me. 50.

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- 1 A. 50?
- 2 Q. 50, yes, ma'am.
- 3 A. So this was -- this was a setup also. This was
- 4 the final setup. They used this to -- I believe
- 5 to terminate me. This happened January the 20th,
- 6 and I was terminated on January the 25th.
- 7 Q. So do you contend that the -- you have testified
- 8 that the e-mail exchange did actually occur?
- 9 A. Yes, it did.
- 10 Q. What do you contend was set up about the e-mail
- 11 exchange?
- 12 A. The incident was pertaining to Officer Donald --
- 13 I think his name, first name, is Donald Colbert.
- 14 And two days prior to this e-mail I had met with
- 15 Glen Boyd, and there was not a problem concerning
- 16 our meeting over Officer Colbert's time sheet.
- 17 Well, two days after that the officer had met
- 18 with John Wolford, and then this -- Glen's e-mail
- 19 was devised and sent to me after the issue
- 20 pertaining to my work as far as completing a
- 21 payroll had been completed. This is almost like
- 22 an afterthought.
- 23 They are accusing me of purposely and
- 24 willingly, willfully calling this officer,
- 25 telling him that Glen Boyd is cheating him out of

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- 1 unhappiness. His unhappiness was due to the fact
- 2 his time had been changed by another officer.
- 3 Q. Other than this e-mail exchange, do you contend
- 4 that Glen Boyd participated in the conspiracy in
- 5 any other way?
- 6 A. I'm not sure.
- 7 Q. Other than Pat Ford, Tonny Marrow, Don Jenkins,
- 8 John Wolford, and Glen Boyd, is there anyone else
- 9 that you believe has participated in the
- 10 conspiracy to set you up to be terminated?
- 11 A. I believe the mayor has a part in it. I believe
- 12 the district attorney also has a part in it.
- 13 Q. The mayor, Al Woodlief?
- 14 A. That's correct.
- 15 Q. And you believe the district attorney, Sam Currin
- 16 also participated in the conspiracy?
- 17 A. That's correct.
- 18 Q. How do you contend the mayor participated in the
- 19 conspiracy?
- 20 A. He sent out a letter in -- when he was running
- 21 for mayor, and I believe it was November of 2005.
- 22 And in his letter he stated that all of these
- 23 agencies -- or he listed several different ones
- 24 like the district attorney, the city attorney,
- 25 the League of Municipalities, the SBI had

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- 1 hours, which is not the case at all. I called
- 2 the sergeant, and then I called the officer. He
- 3 didn't answer. I left messages for the sergeant
- 4 and the officer, and the officer was the first
- 5 one to call me back. I asked him to verify his
- 6 comp time. His overtime was not an issue. It
- 7 was his comp time that had been left off of his
- 8 regular time sheet. And that's what I believe.
- 9 That this is a setup. That he falsely accuses
- 10 me. He even makes comments like I had been
- 11 warned, "You have been warned about such
- 12 conduct." And I mean, I don't know what he's
- 13 talking about. I don't get that.
- 14 So to me, this is the final setup, and I
- 15 actually believe that Wolford and Glen Boyd
- 16 devised this e-mail together and sent it to me
- 17 Friday morning, because five days later I was
- 18 terminated.
- 19 Q. And Glen Boyd's e-mail dated Friday, January the
- 20 20th, which is on page 2 of Exhibit Number 50, he
- 21 says, "We have an officer -- we have an employee
- 22 that is not happy," about eight lines down. Do
- 23 you contend that Officer Colbert was happy?
- 24 A. No. I'm not saying that the officer was happy,
- 25 but I'm saying that I was not the cause of his

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- 1 investigated the issues.
- 2 Q. And how do you contend the district attorney, Sam
- 3 Currin, participated in the conspiracy?
- 4 A. Because he did not investigate. I believe that
- 5 he did not conduct an investigation personally,
- 6 himself, to start with where there was a claim
- 7 that he had. No one spoke to me. No one
- 8 interviewed me. Nobody asked to see my
- 9 documents, hear my side of the story. So I feel
- 10 like he was involved. I feel like he should have
- 11 called for an investigation, where he didn't. I
- 12 believe that he may have spoken to the city
- 13 manager or John Wolford, and based his
- 14 assumptions -- or based the fact that he didn't
- 15 investigate according to what they told him.
- 16 Q. Is there anybody else that you believe has
- 17 participated in the conspiracy?
- 18 A. Not that I can recall or say right now.
- 19 Q. Is there anything with regard to any of the
- 20 testimony that you have given today that you feel
- 21 the need to correct, change, or elaborate on as
- 22 we sit here?
- 23 A. Not that I can think of right now.
- 24 Q. To the best of your knowledge as you sit here,
- 25 are all the answers that you've given me today

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- 1 true and correct to the best of your knowledge?
- 2 A. To the best of my knowledge they are true and
- 3 correct.
- 4 MS. DAVIS: I don't have any further
- 5 questions.
- 6 MR. MONTEITH: All right, just a
- 7 couple. I promise. Are you okay, Sharon?
- 8 WITNESS: Yeah.
- 9 MR. MONTEITH: All right.
- 10 MS. DAVIS: Do you want to take a quick
- 11 break?
- 12 MR. MONTEITH: Okay, sure.
- 13 (A recess is taken from 6:38 to 6:42 p.m.)
- 14 CROSS-EXAMINATION
- 15 BY MR. MONTEITH:
- 16 Q. Okay, Ms. Iglesias, just a couple of quick
- 17 questions, I promise. Very early on today you
- 18 were giving testimony concerning your legal fees
- 19 that you have incurred in this matter?
- 20 A. Correct.
- 21 Q. When you testified concerning those legal fees
- 22 and gave the amount, did that amount -- let me
- 23 just ask it this way. Do you owe legal fees in
- 24 addition to what you've already paid?
- 25 A. Yes.

SHARON IGLESIAS

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- 1 MR. MONTEITH: I have no other questions.
- 2 MS. DAVIS: Neither do I.
- 3 -----
- 4 AND FURTHER DEPONENT SAITH NOT.
- 5 (Deposition completed: 6:45 p.m.)
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SHARON IGLESIAS

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- 1 Q. Do you know what that amount is as of right now,
- 2 as we sit here today?
- 3 A. No.
- 4 Q. You also testified at the end of the deposition
- 5 concerning the mental anguish that you suffered
- 6 as a result of your termination. Was your
- 7 termination reported in the local media and
- 8 newspapers?
- 9 A. Yes, it was.
- 10 Q. And how -- how did that impact you?
- 11 A. It was actually recorded in, I think, three
- 12 newspapers, The Henderson Daily Dispatch, The
- 13 Oxford Public Ledger, and The Durham Morning
- 14 Herald. The Henderson Dispatch and the Herald
- 15 simply told a story of my termination. The
- 16 Oxford Public Ledger listed my termination under
- 17 crime reports and making it look as if I had
- 18 committed a crime as -- and briefly telling the
- 19 story of my termination. And that was extremely
- 20 devastating. I actually had people saying things
- 21 to me about that, relatives wanting to know what
- 22 crime I had committed that I was terminated.
- 23 "Did you steal the money," was the number one
- 24 question. And that was very devastating.
- 25 Q. Thank you.

SHARON IGLESIAS

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- 1 I HAVE READ THE FOREGOING PAGES, 1 THROUGH 274
- 2 INCLUSIVE, AND FIND THAT THEY CONTAIN A CORRECT
- 3 TRANSCRIPTION OF THE ANSWERS MADE BY ME TO THE
- 4 QUESTIONS THEREIN RECORDED, WITH THE EXCEPTION OF
- 5 CORRECTIONS AS LISTED ON A SEPARATE SHEET OF PAPER AND
- 6 INCORPORATED INTO THIS RECORD.
- 7
- 8 SHARON B. IGLESIAS
- 9
- 10 SWORN TO AND SUBSCRIBED BEFORE ME THIS
- 11 THE ____ DAY OF _____, 2008.
- 12
- 13 NOTARY PUBLIC
- 14 MY COMMISSION EXPIRES: _____
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SHARON IGLESIAS

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SHARON IGLESIAS

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STATE OF NORTH CAROLINA CERTIFICATE
COUNTY OF GUILFORD

I, DOVIE L. HANFORD, Notary Public in and
for the County of Guilford, State of North Carolina at
Large, do hereby certify:

That there appeared before me the foregoing
witness at the time and place herein aforementioned;
that the foregoing pages numbered 1 through 274,
inclusive, constitute a true and correct transcription
of the proceedings.

I do further certify that the persons were
present as stated in the appearances.

I do further certify that I am not of
counsel for, or in the employment of, either of the
parties in this action, nor am I interested in the
results of this action.

In witness whereof, I have hereunto set my
hand this the ____ day of _____, 2008.

Dovie L. Hanford, Notary Public
Notary Number: 19950110022